TRC formerly Alliance Technologies Corporation
TRC Environmental Corporation

291 Broadway, Suite 1206
New York, NY 10007
☎ (212) 349-4616
Fax (212) 349-4648

HAND DELIVERY

January 7, 1994

Elizabeth Van Rabenswaay
Regional Project Officer
U.S. Environmental Protection Agency
Air and Waste Management Division
26 Federal Plaza, Room 1006
New York, NY 10278

Reference: Contract No. 68-W9-0003, TES 6
Work Assignment No. R02040
Multi Sites Preliminary RFAs
(Ref. 1-635-393)

Subject: Deliverable - Preliminary RCRA Facility Assessment (Revision No. 1) for Fabric Leather Corporation, EPA ID No. NYD008918450

Dear Liz,

In accordance with the reporting requirements of the subject Work Assignment, enclosed is one copy of the Preliminary RCRA Facility Assessment Report (Revision No. 1) for the Fabric Leather Corporation facility (EPA ID No. NYD008918450) which addresses comments made by the EPA WAM, John G. Nevius.

At the request of the WAM, a copy has been delivered directly to him.

Questions regarding this submission should be directed to the TRC Project Manager, Michael F. Clark, or me at (212) 349-4616.

Sincerely,

for Douglas Sullivan
Regional Manager

DS/es

cc: John G. Nevius/EPA Work Assignment Manager
Jean Poovey/EPA TES-6 Contracting Officer (letter only)
Michael F. Clark/TRC Project Manager
TES ZPMO (letter only)

PRELIMINARY RCRA FACILITY ASSESSMENT
FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Air and Waste Management Division
26 Federal Plaza
New York, New York 10278

Work Assignment:	R02040
EPA Region:	II
EPA Site/Facility I.D. No.:	NYD008918450
Contract No.:	68-W9-0003 (TES-6)
TRC Document No.:	NY-R40.R7A
TRC Project No.:	1-636-393-3-2000-0
TRC Project Manager:	Michael F. Clark, P.E.
Telephone No.:	(212) 349-4616
Subcontractor No.:	N/A
Subcontractor Project Manager:	N/A
Telephone No.:	N/A
EPA Work Assignment Manager:	John G. Nevius
Telephone No.:	(212) 264-9578
Date Prepared:	January 6, 1994
Revision No.:	1

TRC ENVIRONMENTAL CORPORATION
291 Broadway, Suite 1206
New York, New York 10007
(212) 349-4616

TRC

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Jim Reidy crossed out "Enforcement confidential" from the RFA that is not a Revision. This RFA is considered one report.

TABLE OF CONTENTS

TABLES

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1.0 INTRODUCTION

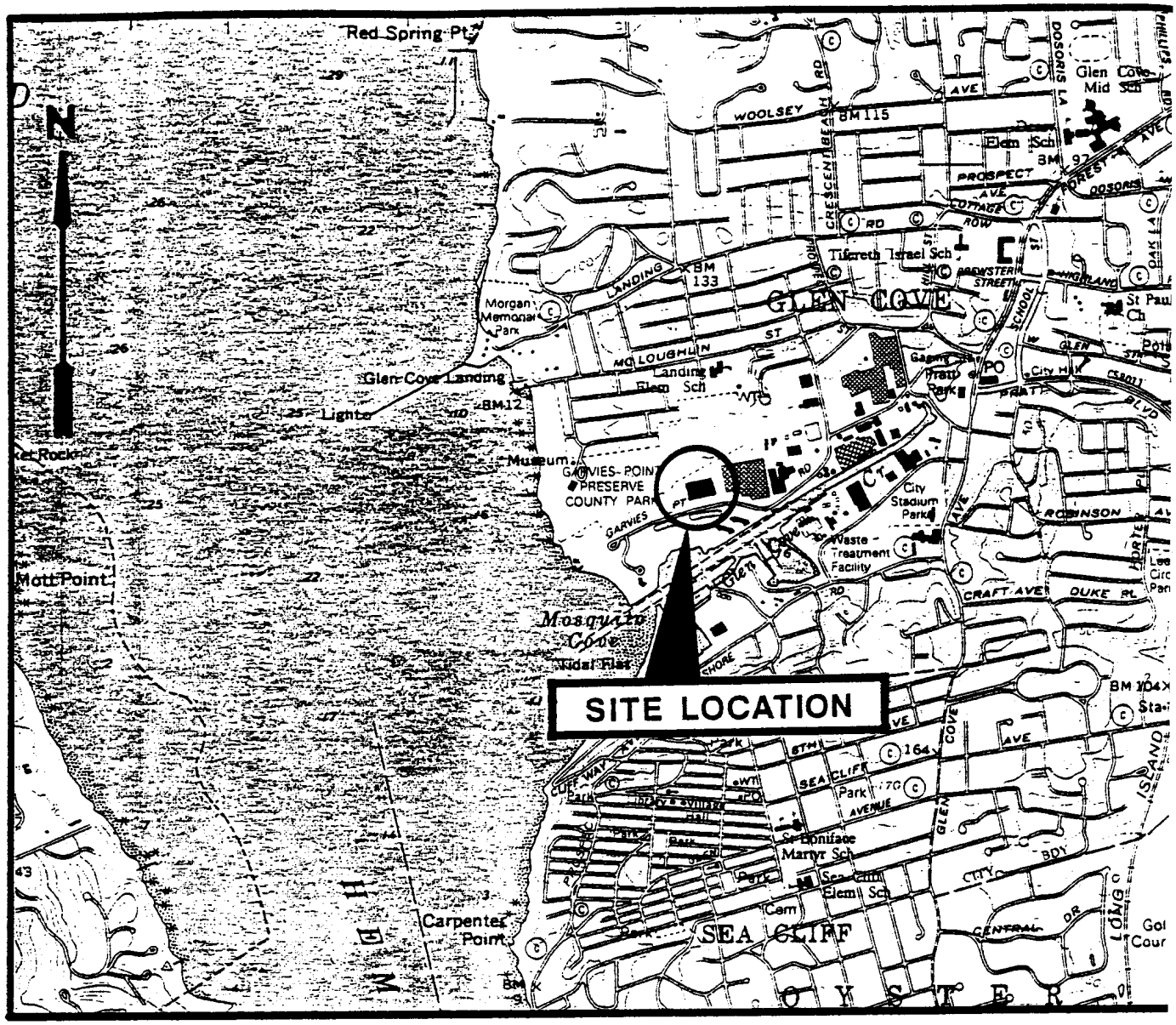
TRC Environmental Corporation (TRC - formerly Alliance Technologies Corporation) was requested by the U.S. Environmental Agency (EPA) under EPA Contract No. 68-W9-0003 (TES-6), Work Assignment No. R02040, to perform a Preliminary RCRA Facility Assessment (RFA) of the Fabric Leather Corporation (Fabric Leather) facility in Glen Cove, New York (EPA I.D. No. NY0008918450). Tasks were performed in accordance with the Preliminary RFA Scope of Work provided by EPA on June 8, 1993, and TRC's Work Plan, dated July 14, 1993.

The purpose of the Preliminary RFA is to identify, gather information on, and evaluate the potential for releases to the environment from areas of concern (AOCs), including solid waste management units (SWMUs) and areas where releases may have occurred in the past. In addition, the Preliminary RFA will provide information for EPA use in the ranking of this facility using the National Corrective Action Prioritization System (NCAPS).

Background information for this Interim Preliminary RFA Report was obtained through file searches conducted at the New York State Department of Environmental Conservation (NYSDEC), Albany, New York, Bureau of Hazardous Waste Facility Compliance, Bureau of Wastewater Facilities Design, and the Bureau of Air Application, Review and Permitting. In addition, file reviews were also conducted at the EPA Region II headquarters in New York, New York and the NYSDEC Region I headquarters in Stony Brook, New York. A limited site reconnaissance was also performed.

2.0 FACILITY DESCRIPTION

The Fabric Leather facility is located at 40 Garvies Point Road in Glen Cove, Nassau County, New York (Figure 1). The facility consists of a factory/warehouse/office building and a parking lot (Figure 2). Information regarding block and lot number as well as lot size was not available during the preliminary NYSDEC file review. The site reconnaissance conducted on September 1, 1993 noted "For Lease" signs on the property as well as signs indicating that Fabric Leather is or was a subsidiary of Borden Chemical. No activity was noted on the property at the time of the site reconnaissance. Based on Figure 1, Glen Cove is located approximately one-eighth of a mile south of the facility. Hempstead harbor is one-third of a mile to the east. Residential areas appear to be located to the north and south. A number of large buildings are indicated on the map to the east, and are assumably industrial facilities. Konic, formerly Powers Chemical Company, neighbors the eastern portion of fabric leather.



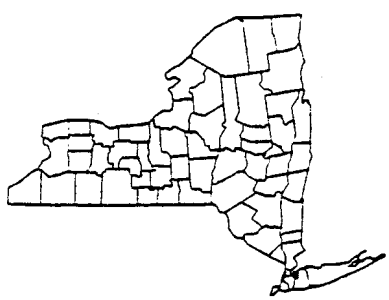
SCALE 1:24000

1 0 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

1991 magnetic declination is approximately 13.5° West



QUADRANGLE LOCATION

SOURCE: USGS 7.5 MINUTE TOPOGRAPHIC MAP QUADRANGLE, SEA CLIFF, N.Y.

TRC

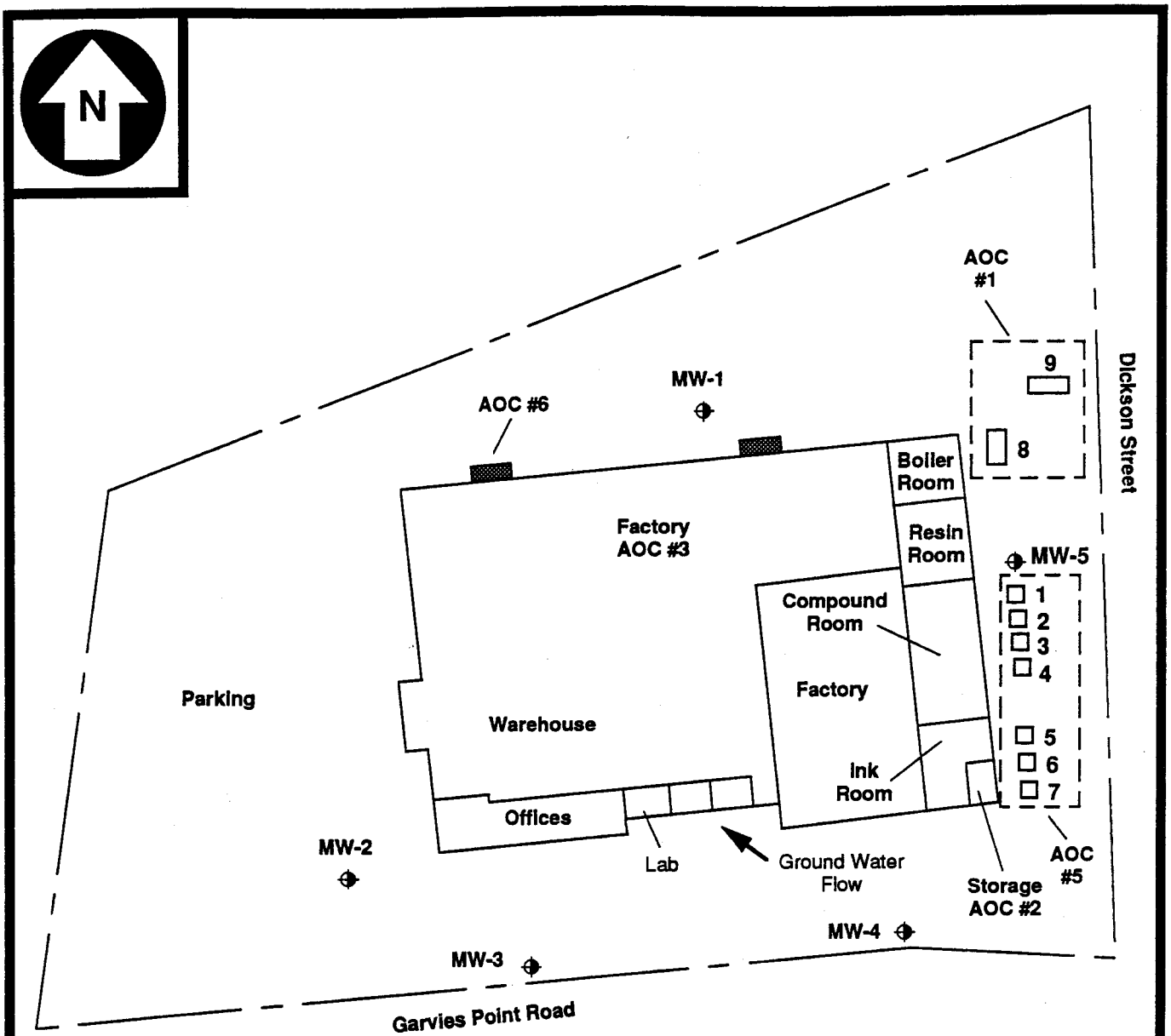
TRC Environmental Corporat
18 Worlds Fair Drive
Somerset, N.J. 08873

FABRIC LEATHER CORPORATION
40 GARVIES POINT ROAD
GLEN COVE, N.Y.

SITE LOCATION MAP

Date: 8-26-93	Proj.# 1-635-393	Fig.

WORK ASSIGNMENT NO. R02(



Key	
⊕	Approximate Location of Ground Water Monitoring Well (screened interval unknown)
☐ 1-3	5,000 gallon USTs
☐ 4	2,500 gallon UST
☐ 5-7	1,500 gallon USTs
☐ 8	10,000 gallon UST
☐ 9	20,000 gallon UST

Compiled From: A.H. Salkowitz, Jamaica, New York and Killam Associates, Consulting Engineers

Not to Scale

FACILITY PLAN

FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK

TRC

Figure 2.

MS73/1/1

Fabric Leather began manufacturing expanded vinyl (imitation leather) in 1966. Processes included mixing polyvinyl chloride resin with solvents. The facility ceased operations in 1988 (NYSDEC, 1988a).

Six Areas of Concern (AOCs) were identified during the preliminary file review. Table 1 outlines the currently known AOCs at Fabric Leather and Figure 2 depicts the approximate location of AOCs #1, #2, #5, and #6. The following is a description of each AOC.

AOC #1 is an area east of the facility building consisting of a 20,000 gallon underground storage tank (UST) and a 10,000 gallon UST. These tanks were previously used to store "solvents and petroleum products" which were apparently then incinerated for heating purposes at the facility (NYSDEC, 1988a). A 1981 RCRA Inspection Report makes reference to two (2) hazardous waste tanks with a total capacity of 30,000 gallons. Therefore, it is assumed that both tanks classify as RCRA HWMUs. Furthermore, it is noted that most waste is burned on-site for energy recovery. (NYSDEC, 1981). These two tanks were emptied and certified closed on November 7, 1985 (see Appendix D) (NYSDEC, 1988a).

AOC #2 is an indoor hazardous waste storage area located in the southeast corner of the facility building which was used to store solvents for less than 90 days. This HWMU stored wastes which included solvents containing methylene chloride (F003), solvents containing toluene and naphtha (F002), and resins contaminated with the above solvents (F005) (NYSDEC, 1988a).

AOC #3 is an incinerator (location unknown) which was used to burn exhaust from machines via an air permit. This SWMU was in place in 1981; however, it was not being used because emission standards were not met. It was intended to burn exhaust fumes, and it is not known if the fumes contained hazardous constituents. (NYSDEC, 1981). The incinerator apparently replaced an electrostatic precipitator which was used to collect non-hazardous plasticizer droplets. (NYSDEC, 1988a). The exact location was not indicated in the files reviewed.

AOC #4 is a discharge (location unknown) for non-contact cooling water (Permit #NY0140546) (NYSDEC, 1988a).

AOC #5 consists of an area east of the facility building where three 5,000-gallon USTs (Tanks 1 through 3), one 2,500-gallon UST (Tank 4) and three 1,500-gallon USTs (Tanks 5 through 7) are or were located. Tanks 1 through 4 contain non-hazardous plasticizer; Tank 5 contains petroleum naphtha; and tanks 6 and 7 contain methyl ethyl Ketone (MEK) (Gates, 1989). No other information describing the tanks was available in the files reviewed. (NYSDEC, 1988b).

TABLE 1. AREAS OF CONCERN

AOC No.	Description	Operational Dates	Release Status	Reference	Medium/ Compounds Detected	Off-site Migration Potential
1	1 20,000-gallon underground storage tank (UST) 1 10,000-gallon UST East of Facility Bldg.	Unknown/ 1985	Potential release	NYSDEC, 1988a NYSDEC, 1988b	Ground water/ Chlorinated solvents	High - ground water is contaminated
2	Indoor Hazardous Waste Storage Area	1966 (?) 1988	Unknown	NYSDEC, 1988a	N/A	Unknown - No information available
3	Incinerator (location unknown)	Unknown/ 1988	Unknown	NYSDEC, 1988a	N/A	Unknown - No information available
4	Former discharge (location unknown) for non-contact cooling water	Unknown/ 1988	Unknown	NYSDEC, 1988a	N/A	Unknown - No information available
5	3 5,000-gallon USTs 1 2,500-gallon UST 3 1,500-gallon USTs	Unknown/ Unknown	Potential release	NYSDEC, 1988a NYSDEC, 1988b	Ground water/ Chlorinated solvents	High - ground water is contaminated
6	ESP/Incinerator Stained Soil Area	1966/ Unknown	Documented Release	Killam, 1988	Soil/phthalates, metals	Low; source was removed, area was capped.

AOC #6 is the ESP/incinerator stained soil area in the vicinity of Sample 6 collected by Killam Associates in 1988. This area was found to contain phthalates at concentrations as high as 380,000 milligrams per kilogram (Killam, 1988). Some soil was excavated and an asphalt seal was installed. The area appears to be associated with a release from the electrostatic precipitator and incinerator.

3.0 FACILITY ACTIVITY/HISTORY

Fabric Leather occupied the facility between 1966 and approximately 1988 (NYSDEC, 1988). The property is situated adjacent to the Mattiace Petrochemical Company Superfund site, EPA ID #NYD000572459. This Superfund site was a former chemical distribution operation, and the soil, ground water and local drinking water is known to contain Volatile Organic Compounds (VOCs) (EPA, 1990). Further information describing the Superfund site is presented in Appendix E.

The facility manufactured expanded vinyl (imitation leather) by mixing polyvinyl chloride resin with solvents. Wastes, including methylene chloride, toluene, naphtha, and contaminated resins, were generated from roller washing operations and from the electrostatic precipitator. In 1988, wastes were stored in drums (NYSDEC, 1988a). No further information regarding facility operations or waste streams generated was located by TRC during the Preliminary Review.

On November 7, 1985 the two USTs at AOC #1 were certified closed in accordance with 6NYCRR 360.8(c)(6)(v). Each tank was hydrostatically leak tested, triple rinsed, scraped and cleaned. Waste rinse liquids were manifested and removed from the facility (Donnelly, 1985). After closure, these tanks were used to store No. 2 fuel oil for heating the on-site building (Donnelly, 1986).

On March 27, 1986 Fabric Leather submitted a Closure Plan to the NYSDEC (Borden, 1986a).

On April 2, 1986, NYSDEC informed Fabric Leather that its office had received engineering certification of closure for the Fabric Leather facility and that all applicable regulatory requirements had been met for RCRA-permitted portions of the facility. NYSDEC further stated that Fabric Leather was required to submit a formal request to the EPA to deny their Part B permit in order to terminate the facility's interim status (NYSDEC, 1986). Fabric Leather submitted this request on April 17, 1986 (Borden, 1986b).

On October 6, 1988, NYSDEC notified Fabric Leather that their Interim Status was being retained pending an investigation which was being performed to evaluate the necessity of corrective action measures required under the Federal Hazardous and Solid Waste Amendments (HSWA) Section 3008(h) (NYSDEC, 1988c).

On October 24, 1988, NYSDEC informed Fabric Leather that the facility was required to undergo full closure (NYSDEC, 1988d). Further information regarding facility closure and shut-down was not found during the Preliminary Review.

On November 11, 1988, Killam Associates, Consulting Engineers completed a site inspection report for Fabric Leather. Five ground water monitoring wells were installed and sampled. Six surface soil locations were sampled and analyzed for volatile organic compounds, base-neutral/acid extractables, polychlorinated biphenyls, pesticides and metals. Laboratory data indicates that ground water sampled from MW-1 contained 8.8 micrograms per liter (µg/l) 1,1-dichloroethane, 16 µg/l 1,1-dichloroethylene, 5.3 µg/l methylene chloride, and 1,200 µg/l 1,1,1-trichloromethane. Samples from MW-5 contained 170 µg/l tetrachloroethylene, 22 µg/l trichloroethylene and 7.2 µg/l cis-1,2-dichloroethylene (NYSDEC, 1988b). Soil samples were found to contain metals, including antimony as high as 59 milligrams per kilogram (mg/kg) (Sample 4); copper as high as 21.5 mg/kg (Sample 6); lead as high as 23 mg/kg (Sample 4), and thallium as high as 22 mg/kg (NYSDEC, 1988b). In addition, in Sample 6 base-neutral/acid extractables (BNAs) were detected in soils at concentrations as high as 380,000 µg/kg of bis(2-ethylhexyl)phthalate, and 120,000 µg/kg of butyl benzene phthalate. Analytical data including sampling locations and laboratory analytical results from this event are presented in Appendix B.

Based on the analytical data, Killam recommended that soils from the visibly discolored areas (presumably around samples 2 through 6) be removed (Killam, 1988). In addition to chemical contamination, Killam noted that at least one boiler tank was lined with asbestos containing material (35 percent Amocite asbestos) (Killam, 1988).

According to undated diagrams located in the NYSDEC files reviewed by TRC, soil was excavated in the area of sample 6, which may have been associated with the electrostatic precipitator and the incinerator. The figures are presented in Appendix A.

In 1992, remedial activities were conducted at the north end of the building associated with AOC #6. The encapsulated area was 6 feet by 110 feet, and excavation was conducted to a depth of 6 feet. Further excavation could not be conducted because it would threaten the structural integrity of the building. The area was backfilled and paved. T.M. Gates, Incorporated (T. M. Gates) conducted the oversight, and reported that the pavement exceeded the requirements of the Work Plan. (Gates, 1992).

In addition, elevated levels of TPH were detected between Tanks 5 and 6, and the loading dock. Excavation could not be conducted because of the building structure. Instead, pressure grouting was used to immobilize the contaminant, and consisted of a mixture of Portland cement, bentonite clay, and water. T.M. Gates reported that the activities were consistent with the Work Plan. (Gates, 1992).

T. M. Gates also reported that samples collected from monitoring wells 4 and 5 were free of sheen and floating product, fulfilling the final requirement needed for Closure (Gates, 1992).

In 1993, 16,340 ppm of phthalate was detected at the north side of the building indicating that the remediation was not completed (NYSDEC, 1993).

4.0 ENVIRONMENTAL SETTING

Geologically, Long Island forms the Ronkonkama terminal moraine, which, along the northern shore, consists of sand, gravel, and clay to a depth of approximately 250 feet below ground surface (Hang and Salvo, 1980). The Site Investigation conducted by Killam Associates indicates that ground water flows to the northwest (NYSDEC, 1988b). Ground water in the area is no longer used for drinking water. Two municipal wells located approximately one mile from Fabric Leather were closed due to contamination in the 1970s. The depth to the ground water table was not specified in the files reviewed (TRC, 1993). Based on Figure 1, Glen Cove is located approximately one-third of a mile south of Fabric Leather, and feeds into Hempstead Harbor. "Tidal Flat" is depicted next to Mosquito Cove, located at the union of Hempstead Harbor and Glen Cove, indicating the presence of a coastal wetland. Garvies Point Preserve, which is considered a significant natural habitat by the State of New York, is also located immediately west of Fabric Leather.

The Mattiace Petrochemical Company Superfund site is located adjacent to Fabric Leather and is a known source for VOC contamination in the soil, shallow ground water, and former local drinking water wells.

5.0 PRELIMINARY EVALUATION

Analytical data from Killam's Site Investigation conducted in 1988 indicate that ground water at the Fabric Leather property is contaminated with chlorinated solvents. Soils collected from visibly stained areas were found to contain phthalates at concentrations as high as 380,000 mg/kg. Based on information presented in undated figures, the stained soil was associated with the electrostatic processor and incinerator. The area was partially remediated. No other information regarding remedial activities was located by TRC in the available files.

Limited information was located in the state files. Due to the lack of sufficient information, TRC believes that further sampling and environmental investigations should be conducted at the Fabric Leather property.

6.0 SUMMARY

Fabric Leather is located at 40 Garvies Point Road in Glen Cove, New York. Fabric Leather manufactured expanded vinyl (imitation leather) at the facility from 1966 to approximately 1988. Processes included mixing polyvinyl chloride resin with solvents.

Six AOCs have been identified at the facility including a 20,000 gallon UST and a 10,000 gallon UST. Prior to 1985, these tanks were used to store solvents and blended petroleum products which were apparently then incinerated for heating purposes at the facility. In 1985, the two USTs underwent closure procedures and were then used to store No. 2 fuel oil for heating the facility building. In 1988, a site investigation was conducted by Killam Associates, Consulting Engineers. Five ground water monitoring wells were installed and sampled, and six soil samples were collected. Analytical data from the event indicates that ground water flows from the southeast to the northwest and is contaminated with chlorinated solvents. Soils were found to be contaminated with phthalates and metals.

Subsequent to closure of its RCRA-permitted facility operations, Fabric Leather requested that EPA terminate its Interim Status under RCRA. On October 6, 1988, the NYSDEC notified Fabric Leather that their interim status was being retained pending on investigation to determine the need for corrective action under the HSWA.

Based on the available information, releases have occurred from the facility. Sampling previously conducted by Killam Associates is inadequate to fully characterize the extent of contamination.

REFERENCES

Borden, 1986a. Letter to Mrs. A. Ga ra, NYSDEC, RE: Closure Plan for Fabric Leather Corporation. Fabric Leather Corporation, Division of Borden Chemical, Borden, Inc., March 27.

Borden, 1986b. Letter to Mr. Richard A. Baker, Chief, Permits Administration Branch, USEPA - Region II, RE: Request to deny Part B Permit for Fabric Leather Corporation. Borden, Inc., April 17.

Donnelly, 1985. Letter to Mr. John L. Middelkoop, P.E., NYSDEC, regarding UST Closure at Fabric Leather Corporation, Glen Cove, New York. Donnelly Engineering, November 7.

Donnelly, 1986. Letter to Permits Administrator, NYSDEC, Region I, regarding Fabric Leather Corporation, Division of Borden Chemical. Donnelly Engineering, February 19.

Gates, 1989. Letter from Todd Gates, T.M. Gates, Incorporated, President, to Angela B. Pettinelli, Nassan County Department of Health, May 1, 1989.

Gates, 1992. Remediation Oversight Report prepared for the Nassau County Department of Health by Peter F. Paul, Sanitariam I, T.M. Gates, Incorporated, November 30, 1992.

Hang and Salvo, 1980. Toxics on Tap; contamination of Long Island's Drinking Water Supplies, 1980.

Killam, 1988. Report for Site Inspection of the Fabric Leather Facility. Conducted by Killam Associates for Fabric Leather. November 11.

NYSDEC, 1986. Letter to Mr. Stephen J. Michalowski, Fabric Leather Corporation, RE: Certification of Closure. New York State Department of Environmental Conservation, April 2.

NYSDEC, 1988a. Capt Lois Site Visit for Fabric Leather Corporation, Glen Cove, NY, NYD008918450. New York State Department of Environmental Conservation, September 30.

NYSDEC, 1988b. Memo regarding Garvies Point Condominiums - Data from Environmental Survey at Fabric Leather. New York State Department of Environmental Conservation, October 4.

NYSDEC, 1988c. Letter to Mr. Goodger, Fabric Leather Corporation, RE: Retention of Interim Status Classification. New York State Department of Environmental Conservation, October 6.

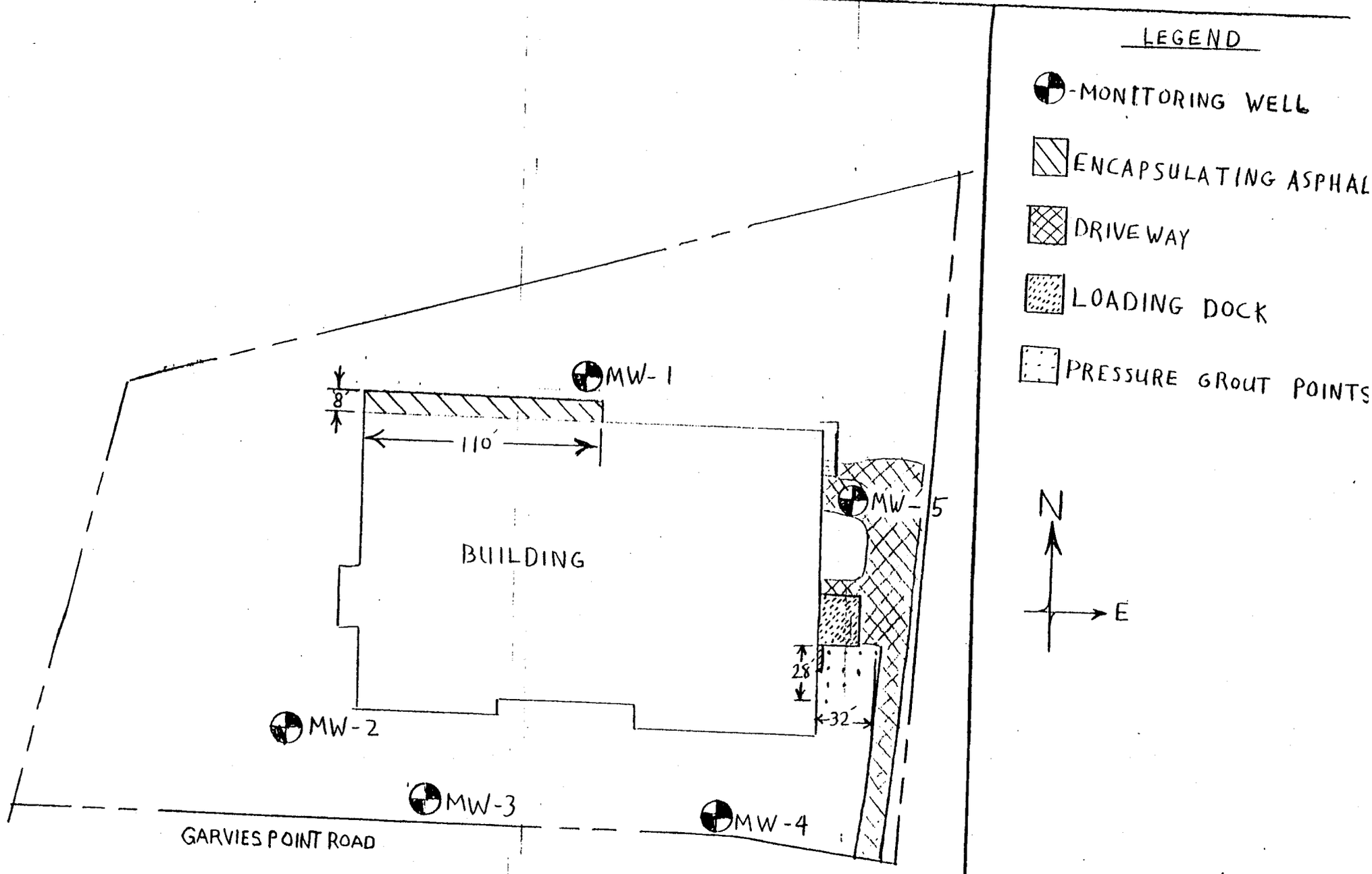
NYSDEC 1988d. Letter to Mr. Richard Springer, P.E. Borden Company, RE: Full Closure Requirement, Fabric Leather Corporation. New York State Department of Environmental Conservation, October 24.

NYSDEC, 1993. Letter from John Conover, NYSDEC, Environmental Engineer, to Gerry Starkey, Borden, Incorporated, Environmental Affairs, April 18, 1993.

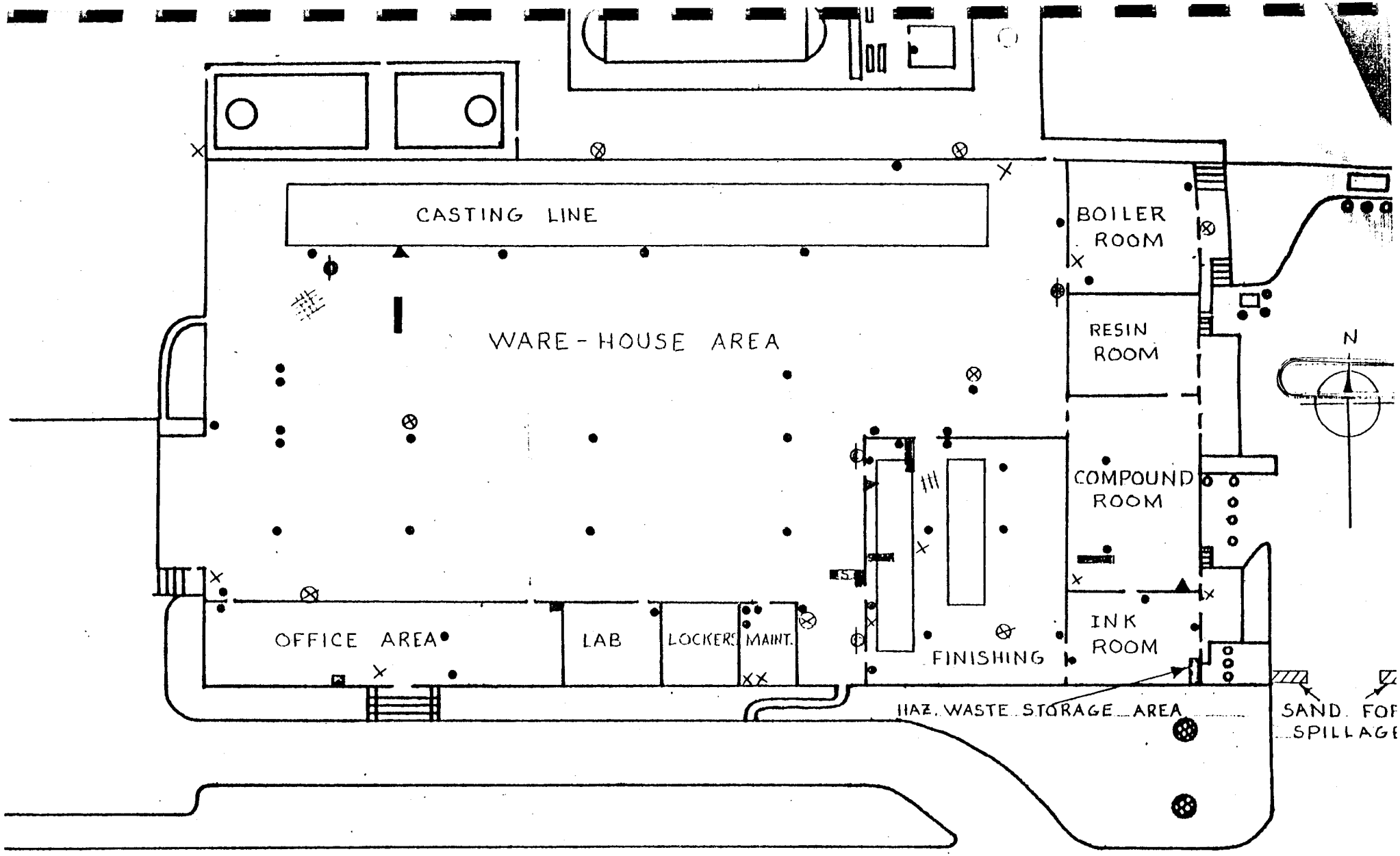
TRC, 1993. Communication between M. Clark, TRC, and M. Martino, Glen Cove Water Superintendent. September 20.

APPENDIX A

FIGURES



SUBJECT: FABRIC LEATHER COATING



● FIRE EXTINGUISHER ⊗ FIRE HOSE ⊕ SCOTT PACKS ▲ EYE WASH AND SHOWER FIRE BLANKET S STRETCHER

EMERGENCY OXYGEN X TELEPHONE

HAZARD WASTE LOCATION

FABRIC LEATHER CORPORATION

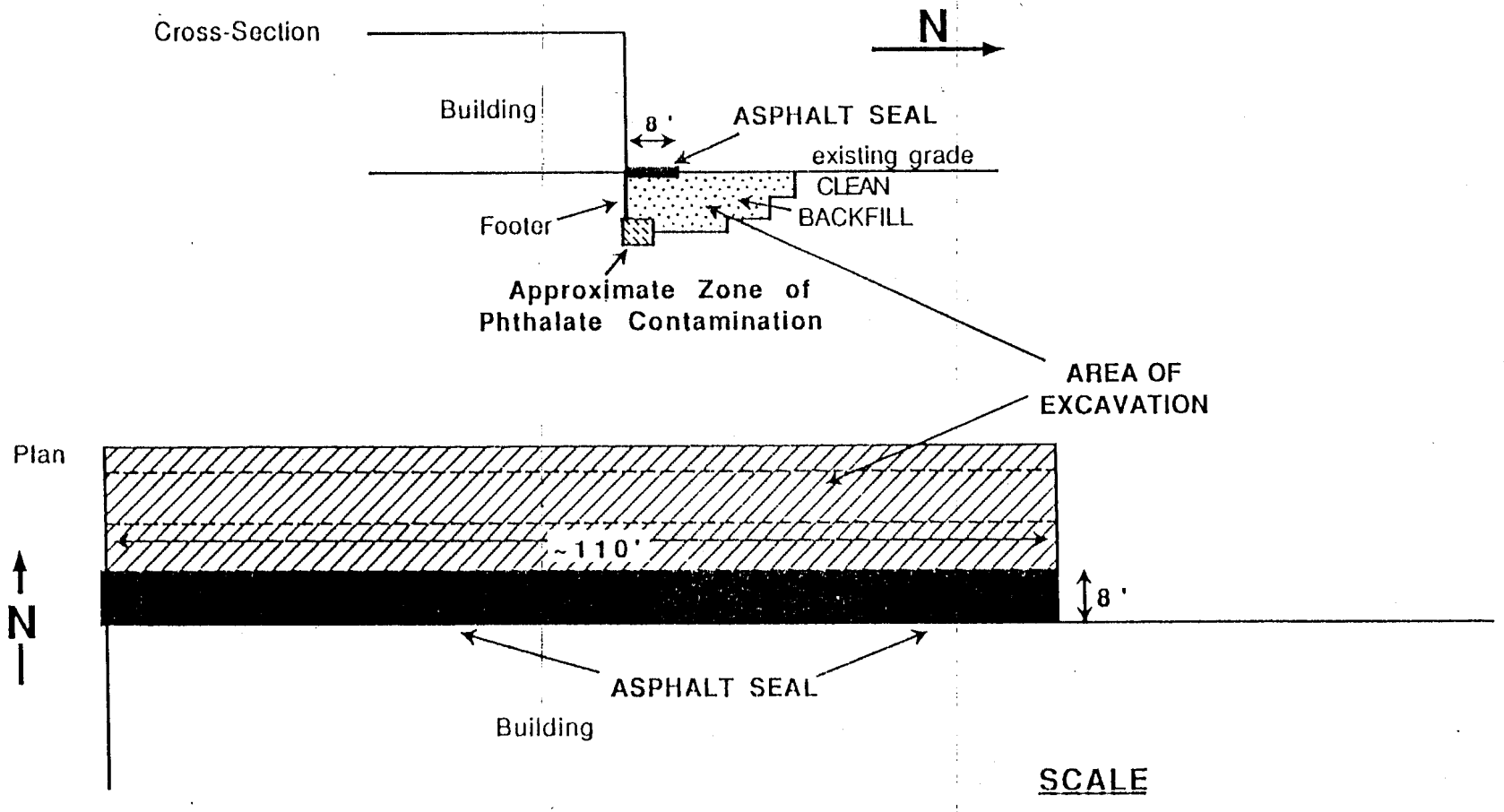
EMERGENCY EQUIPMENT

S MICHALOWSKI PLT ENGR
FABRIC LEATHER

BORDEN, INC. - GLEN COVE, NEW YORK

FIGURE 1

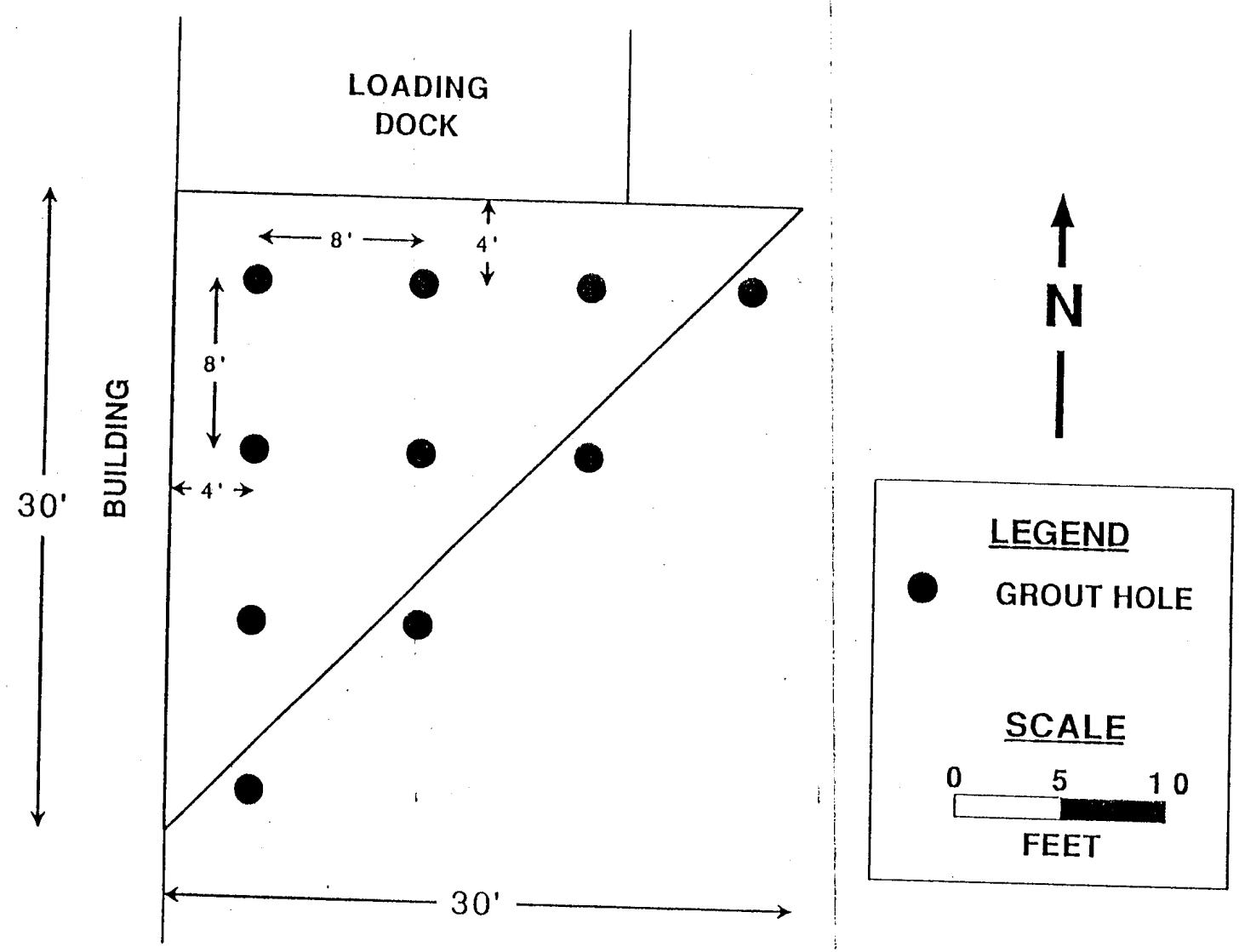
ESP/INCINERATOR EXCAVATION AREA SEALED BY ASPHALT



BORDEN, INC. - GLEN COVE, NEW YORK

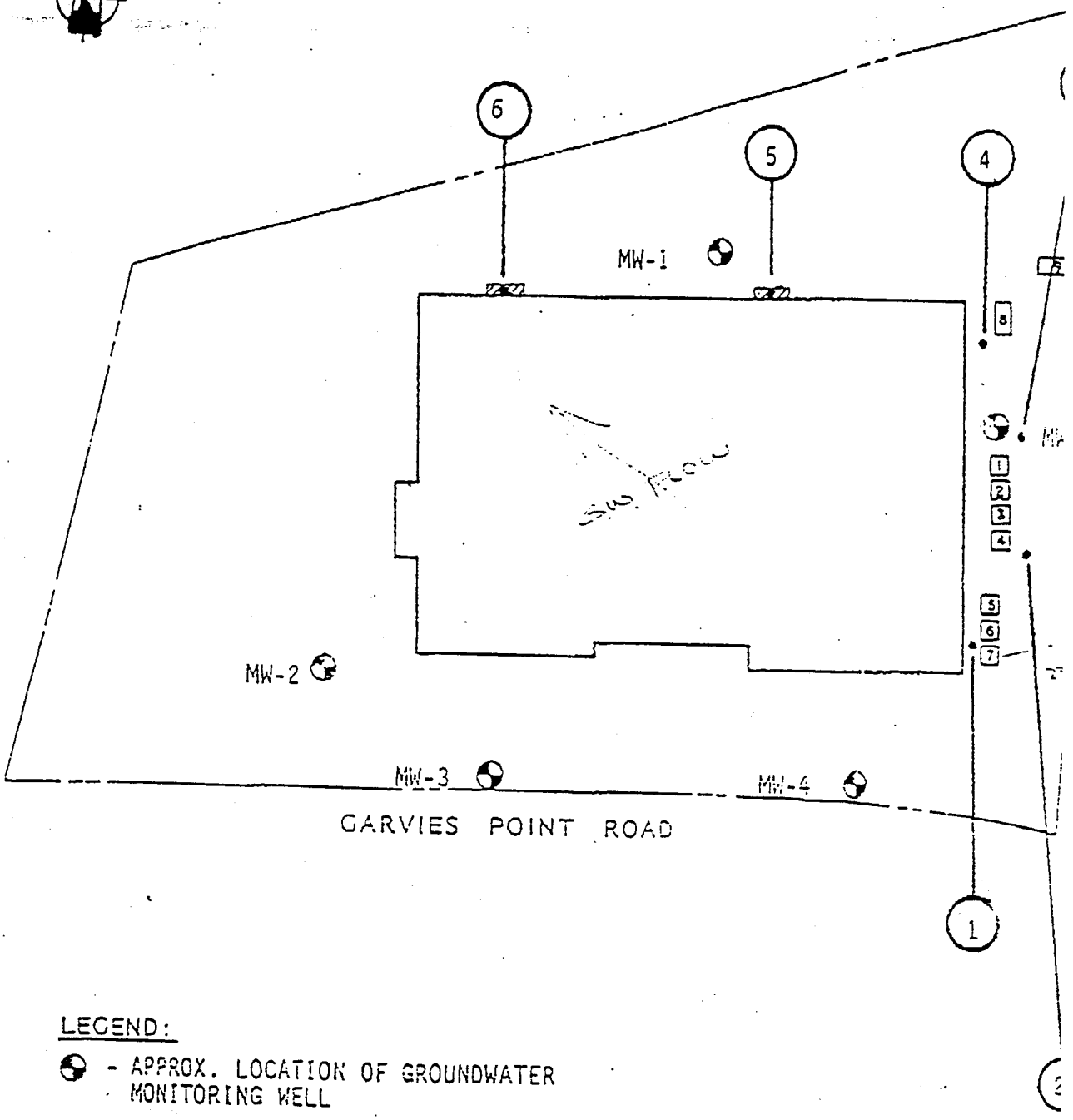
FIGURE 2

PRESSURE GROUTING PLAN



T.M.GATES, INC.

SOILS DATA



LEGEND:

- APPROX. LOCATION OF GROUNDWATER MONITORING WELL

1-3 - 5,000 GAL. U.S.T.

4 - 2,500 GAL. U.S.T.

5-7 - 1,500 GAL. U.S.T.

8 - 10,000 GAL. U.S.T.

9 - 20,000 GAL. U.S.T.

(1) LOCATION AND NUMBER OF SOIL SAMPLE

FIGURE 1

SAMPLING LOCATIONS
FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK

SITE PLAN

SCALE: 1" = 100'±

DeKillam

APPENDIX B

KILLAM, 1988 SOIL AND GROUND WATER DATA

Table I

Sample Locations at Fabric Leather Corp.
Glen Cove, New York

Sample No.	Location *	Description	Depth	
1134-6001	1	near southeast corner of building	12 in.	
1134-6002	2	eastside of building	9 in.	
1134-6003	3	adjacent to garbage dumpster	9 in.	
1134-6004	4	eastside of building between north loading dock & boiler room door	9 in.	
1134-6005	5	northside of building 2130 ft. west of northeastern corner	surficial	
1134-6006	5	same as above	12 in.	
1134-6007	6	between incinerator & northside of the building	surficial	
1134-6008	6	same as above	12 in.	
1134-1005	NA	NA	NA	trip blank
1134-1006	NA	NA	NA	trip blank

* Numbers correspond to locations on Figure 1

Killam Associates : Consulting Engineers

Table 2

RESULTS OF AUGUST, 1988 SOIL SAMPLING
FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK
KILLAM JOB NO. 156200

CONSTITUENT	1131-1005	1134-1006	1134-6001	1131-6002	1134-6003	1134-6004	1131-6005	1131-6006	1131-6007	1134-6008
PEC (UG/KG)	-	46.0	12000	1200	<71	450	12000	370	12000	190
METALS (MG/KG)										
Antimony	**	0.2	51	55	31	59	60	53	63	65
Arsenic	**	0.01	5.7	5.8	3.6	3.7	6.7	5.6	5.5	5.6
Beryllium	**	0.02	0.35	0.32	0.70	0.91	0.30	0.38	0.71	0.51
Cadmium	**	0.01	2.0	3.3	2.3	5.0	1.5	1.5	2.1	1.4
Chromium	**	0.05	9.3	9.2	7.3	7.8	18	13	12	7.7
Copper	**	0.02	11.0	1.30	6.60	10.5	18.5	9.7	21.5	7.70
Lead	**	0.1	15.5	9.2	10.5	23.0	11	12	13	13.5
Mercury	**	**	0.5	9.5	0.5	0.5	0.5	0.5	0.5	0.5
Nickel	**	0.01	13	12	13	26	18	16	17	13
Selenium	**	0.002	0.087	0.082	0.082	0.075	0.09	0.077	0.091	0.093
Silver	**	0.1	0.87	0.11	0.15	1.1	0.15	0.38	0.16	0.16
Thallium	**	0.1	8.7	12	12	22	8.9	12	16	9.3
Zinc	**	0.10	30.4	25.5	19.5	28.8	156	22.5	837	359
VOLATILE ORGANICS (UG/KG)										
Benzene	-	**	-	-	-	-	**	-	**	-
Bromodichloromethane	-	**	-	-	-	-	**	-	**	-
Bromoform	-	**	-	-	-	-	**	-	**	-
Bromomethane	-	**	-	-	-	-	**	-	**	-
Carbon Tetrachloride	-	**	-	-	-	-	**	-	**	-
Chlorobenzene	-	**	-	-	-	-	**	-	**	-
Chloroethane	-	**	-	-	-	-	**	-	**	-
2-Chloroethylvinylether	-	**	-	-	-	-	**	-	**	-
Chloroform	-	**	-	-	-	-	**	-	**	-
Chloromethane	-	**	-	-	-	-	**	-	**	-
Dibromochloromethane	-	**	-	-	-	-	**	-	**	-
1,1-Dichlorobenzene	-	**	-	-	-	-	**	-	**	-
1,2-Dichlorobenzene	-	**	-	-	-	-	**	-	**	-
1,3-Dichlorobenzene	-	**	-	-	-	-	**	-	**	-
1,1-Dichloroethane	-	**	-	-	-	-	**	-	**	-
1,2-Dichloroethane	-	**	-	-	-	-	**	-	**	-
1,1-Dichloroethene	-	**	-	-	-	-	**	-	**	-
trans-1,2-Dichloroethene	-	**	-	-	-	-	**	-	**	-
1,2-Dichloropropane	-	**	-	-	-	-	**	-	**	-
cis-1,3-Dichloropropene	-	**	-	-	-	-	**	-	**	-
trans-1,3-Dichloropropene	-	**	-	-	-	-	**	-	**	-
Ethyl Benzene	-	**	-	-	-	-	**	-	**	-
Methylene Chloride	-	**	-	-	-	-	**	-	**	-
1,1,2,2-Tetrachloroethane	-	**	-	-	-	-	**	-	**	-
Tetrachloroethene	-	**	-	-	-	-	**	-	**	-
Toluene	-	**	-	-	-	-	**	-	**	-
1,1,1-Trichloroethane	-	**	-	-	-	-	**	-	**	-
1,1,2-Trichloroethane	-	**	-	-	-	-	**	-	**	-
Trichloroethene	-	**	-	-	-	-	**	-	**	-
Vinyl Chloride	-	**	-	-	-	-	**	-	**	-
TOTAL VOA TIC (UG/KG)	-	**	225300	-	-	-	**	-	**	-
PESTICIDES/PCB's (UG/KG)	**	-	-	-	-	5350	-	-	-	-
ACID EXTRACTABLES (UG/KG)										
Phenol	**	-	-	-	-	-	-	-	-	-
2-Chlorophenol	**	-	-	-	-	-	-	-	-	-
2-Nitrophenol	**	-	-	-	-	-	-	-	-	-
2,4-Dimethylphenol	**	-	-	-	-	-	-	-	-	-
2,4-Dichlorophenol	**	-	-	-	-	-	-	-	-	-
4-Chloro-3-methyl Phenol	**	-	-	-	-	-	-	-	-	-
2,4,6-Trichlorophenol	**	-	-	-	-	-	-	-	-	-
2,4-Dinitrophenol	**	-	-	-	-	-	-	-	-	-
4-Nitrophenol	**	-	-	-	-	-	-	-	-	-
2-Methyl-4,6-Dinitrophenol	**	-	-	-	-	-	-	-	-	-
Pentachlorophenol	**	-	-	-	-	-	-	-	-	-

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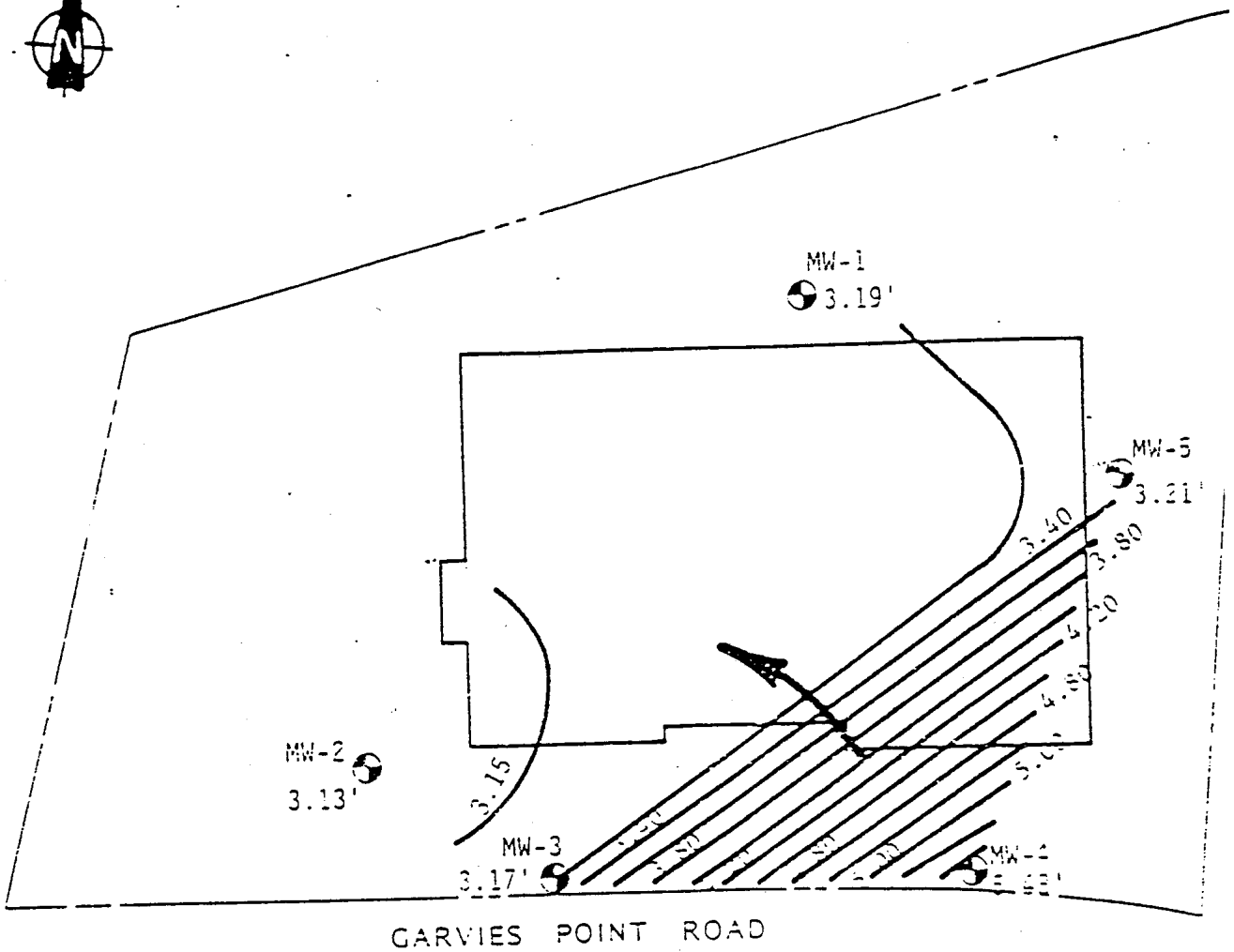
Table 2 (cont'd)

RESULTS OF AUGUST, 1988 SOIL SAMPLING
FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK
KILLAM JOB NO. 156260

CONSTITUENT	1134-1005	1134-1006	1134-6001	1134-6002	1134-6003	1134-6004	1134-6005	1134-6006	1134-6007	1134-6008
BASE NEUTRAL EXTRACTABLES (UG/KG)										
Acenaphthene	**	-	-	-	-	-	-	-	-	-
Acenaphthylene	**	-	-	-	-	-	-	-	-	-
Anthracene	**	-	-	-	-	500	-	-	-	-
Benzo (a) Anthracene	**	-	-	-	-	2100	-	-	-	-
Benzo (a) Pyrene	**	-	-	-	-	1600	-	-	-	-
Benzo (b) Fluoranthene	**	-	-	-	-	4660	-	-	-	-
Benzo (g,h,i) Perylene	**	-	-	-	-	2000	-	-	-	-
Benzo (k) Fluoranthene	**	-	-	-	-	-	-	-	-	-
bis (2-Chloroethoxy) Methane	**	-	-	-	-	-	-	-	-	-
bis (2-Chloroethyl) Ether	**	-	-	-	-	-	-	-	-	-
bis (2-Chloroisopropyl) Ether	**	-	-	-	-	-	-	-	-	-
bis (2-ethyl hexyl) Phthalate	**	-	-	60000	2300	7600	220000	750	211000	7500
4-Bromophenyl-Phenyl Ether	**	-	-	-	-	-	-	-	-	-
Butyl Benzyl Phthalate	**	-	-	-	-	2500	17000	-	120000	4200
2-Chloronaphthalene	**	-	-	-	-	-	-	-	-	-
4-Chlorophenyl-Phenyl Ether	**	-	-	-	-	-	-	-	-	-
Chrysene	**	-	-	-	-	3100	-	-	-	-
Dibenzo (a,h) Anthracene	**	-	-	-	-	550	-	-	-	-
1,2-Dichlorobenzene	**	-	-	-	-	-	-	-	-	-
1,3-Dichlorobenzene	**	-	-	-	-	-	-	-	-	-
1,4-Dichlorobenzene	**	-	-	-	-	-	-	-	-	-
3,3'-Dichlorobenzidine	**	-	-	-	-	-	-	-	-	-
Diethyl Phthalate	**	-	-	-	-	-	-	-	-	-
Dimethyl Phthalate	**	-	-	-	-	-	-	-	-	-
Di-n-Butyl Phthalate	**	-	-	-	-	-	-	-	12000	-
2,4-Dinitrotoluene	**	-	-	-	-	-	-	-	-	-
2,6-Dinitrotoluene	**	-	-	-	-	-	-	-	-	-
Di-n-Octyl Phthalate	**	-	-	-	-	-	-	-	-	-
Fluoranthene	**	-	-	-	230	6600	-	-	-	-
Fluorene	**	-	-	-	-	420	-	-	-	-
Hexachlorobenzene	**	-	-	-	-	-	-	-	-	-
Hexachlorobutadiene	**	-	-	-	-	-	-	-	-	-
Hexachlorocyclopentadiene	**	-	-	-	-	-	-	-	-	-
Hexachloroethane	**	-	-	-	-	-	-	-	-	-
Indeno (1,2,3,c,d) Pyrene	**	-	-	-	-	1550	-	-	-	-
Isophorone	**	-	-	-	-	-	-	-	-	-
Naphthalene	**	-	-	-	-	-	-	-	-	-
Nitrobenzene	**	-	-	-	-	-	-	-	-	-
N-nitroso-di-n-propylamine	**	-	-	-	-	-	-	-	-	-
N-nitrosodiphenylamine	**	-	-	-	-	-	-	-	-	-
Phenanthrene	**	-	-	-	-	3800	-	-	-	-
Pyrene	**	-	-	-	-	5100	-	-	-	-
1,2,4-Trichlorobenzene	**	-	-	-	-	-	-	-	-	-
TOTAL A/B/N TIC'S	**	-	7331000	741100	23650	247850	455000	170	112500	16390

VOA = Volatile Organics; ABN = Acid/Base/Neutral Extractable Compounds
PAH = ... Hydrocarbons; TIC = Tentatively Identified Compounds (Library Search)
** = Not Analyzed; - = Not Detected



LEGEND:

- APPROX. LOCATION OF GROUNDWATER MONITORING WELL RELATIVE GROUNDWATER ELEVATION

(3.13')

3.15' LINE OF EQUAL POTENTIOMETRIC HEAD

GROUNDWATER FLOW DIRECTION

FABRIC LEATHER CORP.
GLEN COVE, NEW YORK

CONCEPTUAL GROUNDWATER CONTOUR MAP

JUNE 9, 1988

CONTOUR INTERVAL = 0.20 FT.

SCALE: 1" = 100'±

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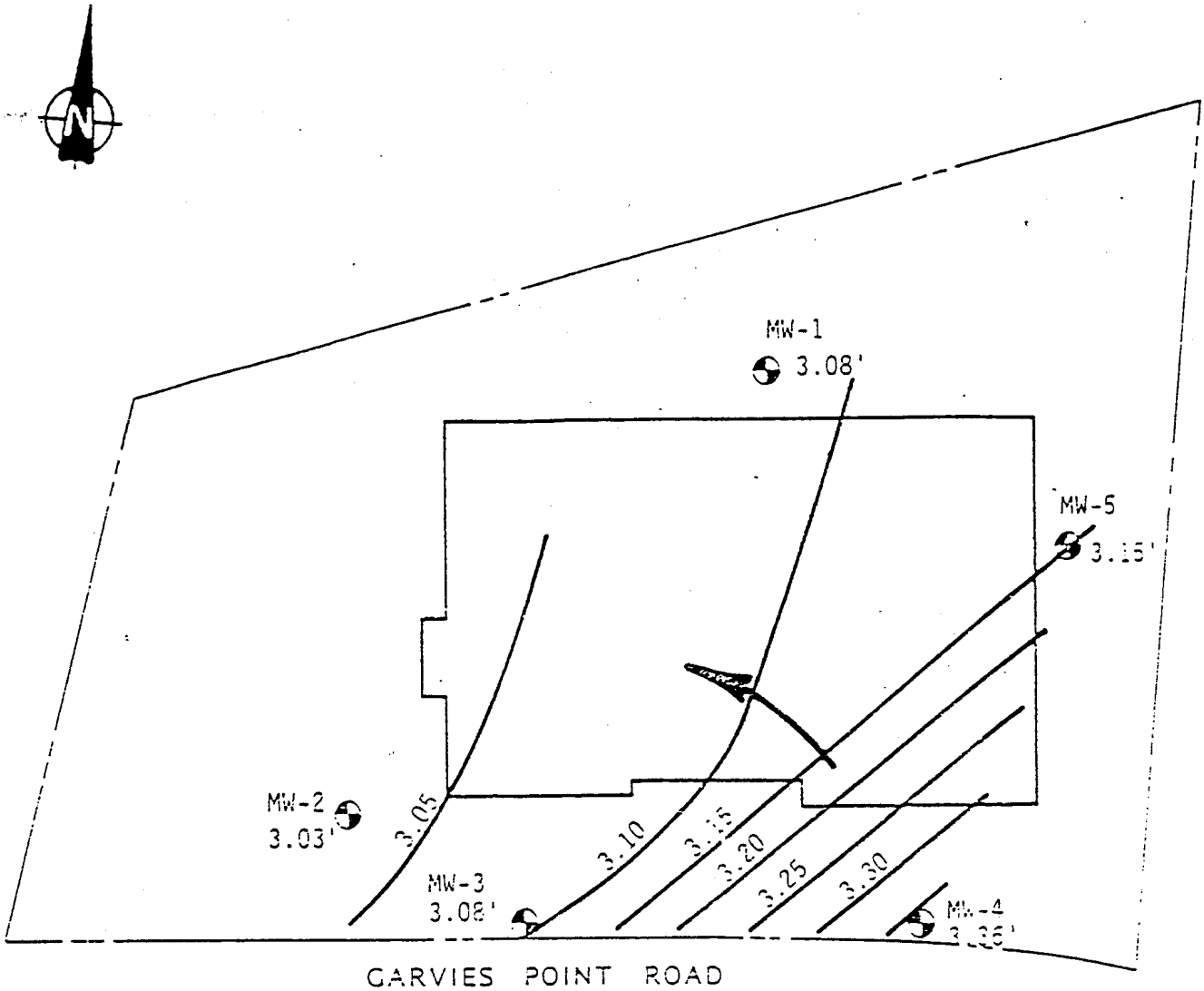

LEGEND:

- APPROX. LOCATION OF GROUNDWATER
(3.03') MONITORING WELL W/RELATIVE GROUNDWATER ELEVATION

3.10' LINE OF EQUAL POTENTIOMETRIC HEAD

GROUNDWATER FLOW DIRECTION

FABRIC LEATHER CORP.
GLEN COVE, NEW YORK

CONCEPTUAL GROUNDWATER CONTOUR MAP

JULY 6, 1988

CONTOUR INTERVAL = 0.05 FT.

SCALE: 1" = 100'±

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MW-1

Lab Sample # : 4888-3

June 30, 1988

LAB ANALYSIS REPORT

Job Name : DLA Lab
Job Number : 000-000-000
Location : 2001
Sample State : Water
Collector : Clt

Customer PO# :
Date Sampled :
Date Received : 06/17/88
Date Completed : 06/27/88
Discard Date : 07/27/88

TEST/PARAMETER	DETECTION LIMIT	RESULT
VOLATILE ORGANICS BY EPA 624		
Benzene	< 2	N.D.
Bromoform	< 2	N.D.
Carbon Tetrachloride	< 2	N.D.
Chlorobenzene	< 2	N.D.
Chlorodibromomethane	< 2	N.D.
Chloroethane	< 2	N.D.
2-Chloroethylvinyl Ether	< 10	N.D.
Chloroform	< 2	N.D.
Dichlorobromomethane	< 2	N.D.
1,1-Dichloroethane	< 2	8.8
1,2-Dichloroethane	< 2	N.D.

**** Continued ****

Comment: A NBS library search was performed on this sample. No compounds were

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MW-1

Lab Sample # : 4898-3
June 30, 1988

TEST/PARAMETER	DETECTION LIMIT	RESULT	
1,1-Dichloroethylene	< 2	16	ug/l
1,2-Dichloropropane	< 2	N.D.	ug/l
1,3-Dichloropropene	< 2	N.D.	ug/l
Ethylbenzene	< 2	N.D.	ug/l
Methyl Bromide	< 5	N.D.	ug/l
Methyl Chloride	< 5	N.D.	ug/l
Methylene Chloride	< 2	5.3	ug/l
1,1,2,2-Tetrachloroethane	< 2	N.D.	ug/l
Tetrachloroethylene	< 2	N.D.	ug/l
Toluene	< 2	N.D.	ug/l
trans-1,2-Dichloroethylene	< 2	N.D.	ug/l
1,1,1-Trichloroethane	< 2	1200	ug/l
1,1,2-Trichloroethane	< 2	N.D.	ug/l
Trichloroethylene	< 2	N.D.	ug/l
Vinyl Chloride	< 5	N.D.	ug/l
PESTICIDES/PCB's			
Aldrin	< 0.1	N.D.	ug/l
alpha-BHC	< 0.1	N.D.	ug/l
beta-BHC	< 0.1	N.D.	ug/l
gamma-BHC (Lindane)	< 0.1	N.D.	ug/l
delta-BHC	< 0.1	N.D.	ug/l
Chlordane	< 0.5	N.D.	ug/l
4,4'-DDT	< 0.1	N.D.	ug/l
4,4'-DDE	< 0.1	N.D.	ug/l
4,4'-DDD	< 0.1	N.D.	ug/l
Dieldrin	< 0.1	N.D.	ug/l
alpha-Endosulfan	< 0.1	N.D.	ug/l

**** Continued ****

Killam
Associates • Consulting Engineers

MW-5

Lab Sample # : 4888-7

June 30, 1988

LAB ANALYSIS REPORT

Job Name : DLA Lab
Job Number : 000-000-000
Location : 2005
Sample State : Water
Collector : Clt

Customer PO# :
Date Sampled :
Date Received : 06/17/88
Date Completed : 06/27/88
Discard Date : 07/27/88

TEST/PARAMETER	DETECTION LIMIT	RESULT	
VOLATILE ORGANICS BY EPA 624			
Benzene	< 2	N.D.	ug/
Bromoform	< 2	N.D.	ug/
Carbon Tetrachloride	< 2	N.D.	ug/
Chlorobenzene	< 2	N.D.	ug/
Chlorodibromomethane	< 2	N.D.	ug/
Chloroethane	< 2	N.D.	ug/
2-Chloroethylvinyl Ether	< 10	N.D.	ug/
Chloroform	< 2	N.D.	ug/
Dichlorobromomethane	< 2	N.D.	ug/
1,1-Dichloroethane	< 2	N.D.	ug/
1,2-Dichloroethane	< 2	N.D.	ug/

**** Continued ****

Comment: A NBS library search was performed on this sample. No compounds were id

D.E. Killam
Associates - Consulting Engineers

MW-5

Lab Sample # : 4888-7
June 30, 1988

TEST/PARAMETER	DETECTION LIMIT	RESULT	UNIT
1,1-Dichloroethylene	< 2	N.D.	ug/l
1,2-Dichloropropane	< 2	N.D.	ug/l
1,3-Dichloropropene	< 2	N.D.	ug/l
Ethylbenzene	< 2	N.D.	ug/l
Methyl Bromide	< 5	N.D.	ug/l
Methyl Chloride	< 5	N.D.	ug/l
Methylene Chloride	< 2	N.D.	ug/l
1,1,2,2-Tetrachloroethane	< 2	N.D.	ug/l
Tetrachloroethylene	< 2	170	ug/l
Toluene	< 2	N.D.	ug/l
trans-1,2-Dichloroethylene	< 2	N.D.	ug/l
1,1,1-Trichloroethane	< 2	N.D.	ug/l
1,1,2-Trichloroethane	< 2	N.D.	ug/l
Trichloroethylene	< 2	22	ug/l
Vinyl Chloride	< 5	N.D.	ug/l
cis-1,2-Dichloroethylene	< 1	7.2	ug/l
PESTICIDES/PCB's			
Aldrin	< 0.1	N.D.	ug/l
alpha-BHC	< 0.1	N.D.	ug/l
beta-BHC	< 0.1	N.D.	ug/l
gamma-BHC (Lindane)	< 0.1	N.D.	ug/l
delta-BHC	< 0.1	N.D.	ug/l
Chlordane	< 0.5	N.D.	ug/l
4,4'-DDT	< 0.1	N.D.	ug/l
4,4'-DDE	< 0.1	N.D.	ug/l
4,4'-DDD	< 0.1	N.D.	ug/l
Dieldrin	< 0.1	N.D.	ug/l

**** Continued ****

APPENDIX C

COMPLETED PRELIMINARY CHARACTERIZATION FORMS

PRELIMINARY RCRA FACILTY ASSESSMENT

PRELIMINARY REVIEW CHECKLIST

WORK ASSIGNMENT NO. R02040

FACILITY: FABRIC LEATHER CORPORATION
40 GARVIES POINT ROAD
GLEN COVE, NEW YORK 11542

EPA ID #: _____

FACILITY CONTACT: MR. STEPHEN J. MICHALOWSKI
(516) 671-8220

KEY

P	PROVIDED
NP	NOT PROVIDED
A	ACCEPTABLE
NA	NOT ACCEPTABLE
Y	YES
N	NO
OR	OBSERVED RELEASE (DIRECT EVIDENCE)
SR	SUSPECTED RELEASE (INDIRECT EVIDENCE)
PoR	POTENTIAL RELEASE (POSSIBLE FOR A RELEASE TO OCCUR)
NR	NO RELEASE HAS OCCURRED (DIRECT EVIDENCE)
SWMU	SOLID WASTE MANAGEMENT UNIT
AOC	AREA OF CONCERN

RFA COMPONENT 1: PRELIMINARY REVIEW (PR)

A. General Manufacturing process description: ✓P ___NP ✓A ___NA

Comments: MANUFACTURE OF EXPANDED VINYL BY MIXING PVC RESIN WITH SOLVENTS.

B. General Facility waste generation description: ✓P ___NP ✓A ___NA

Comments: ROLLER WASHING + FORMERLY FROM AN ELECTROSTATIC PRECIPITATOR STORED IN DRUMS < 90 DAYS

C. Environmental/hydrogeologic setting description: ___P ✓NP ___A ✓NA

Comments: NO INFO

D. SWMU identification list: ✓P ___NP ✓A ___NA

Comments: CAPT LOIS REPORT + CLOSURE PLAN

E. Was the SWMU subset of RCRA regulated units denoted? ___Y ___N ___A ___NA

Comments: N/A

F. Were other AOC's (e.g. spills, leaks) listed? ✓Y ___N ___A ✓NA

Comments: 7 ADDITIONAL UST'S (RAW CHEMICALS, MOST LIKELY) SEEN ON NYSDEC 10-4-88 MEMO FIGURE. FACILITY LOCATED ON TOP OF FORMER DUMP.

G. Were potential off-site exposure pathways identified? (e.g. drinking water wells, irrigated farmland, swamps) ___Y ✓N ___A ✓NA

Comments:

H. Detailed SWMU or AOC information:

SWMU # _____ or AOC #1 FORMER 10,000 & 20,000 GALLON HAZ WASTE USTS

1. Is the unit located on a facility map? ✓Y ___N ✓A ___NA

Comments: _____

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ✓N ___A ✓NA

Comments: No age, construction

3. Waste characteristics (e.g. types, volumes, classification):
___Y ✓N ___A ✓NA

Comments: GENERAL STATEMENT THAT THEY PREVIOUSLY CONTAINED "SOLVENTS" & "BLENDED PETROLEUM PRODUCTS" FOR HEATING.

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: Unknown

b. Soil: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ✓N ✓N/A

Comments: NO CLOSURE SOIL SAMPLES COLLECTED. TANKS PASSED A HYDROSTATIC TEST.

c. Ground water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: SEE ABOVE

d. Surface water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ✓N ✓N/A

Comments: TANKS PASSED HYDROSTATIC TEST IN 1986.

e. Subsurface gas: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: SEE ABOVE

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommend no further action.

✓ Recommend a SITE sampling visit.

i. Was sampling performed as part of this RFA? ___Y ___N

ii. Will the sampling be conducted in a RFI? ___Y ___N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:

b. Is the recommendation acceptable? ___Y ___N

Comments:

H. Detailed SWMU or AOC information:

SWMU # _____ or AOC #2 UNDERGROUND STORAGE TANKS

1. Is the unit located on a facility map? ✓Y ___N ✓A ___NA

Comments: NYSDEC 10/4/88 MEMO WITH KILLAM ASSOC. DATA

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ✓N ___A ✓NA

Comments: NO INFO - PRESUMED TO BE RAW MATERIALS/SOLVENTS

3. Waste characteristics (e.g. types, volumes, classification):
___Y ✓N ___A ✓NA

Comments: NO INFO EXCEPT SIZES 3 - 5,000 Gallon 1 - 2,500 gallon 3- 1,500 gallon

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: Unknown

b. Soil: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: TPH 12,000 PPM LEAD 19.9 PPM ANTIMONY 54 PPM
TOTAL VOA TIC = 225,300 PPB

c. Ground water: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: 170 PPB Tetrachloroethylene 72 PPB TCE AT MW-5

d. Surface water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: Unknow

e. Subsurface gas: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: BASED ON SOIL CONTAMINATION

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommend no further action.

✓ Recommend a VSI sampling visit.

i. Was sampling performed as part of this RFA? ___Y ___N

ii. Will the sampling be conducted in a RFI? ___Y ___N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:

b. Is the recommendation acceptable? ✓Y ___N

Comments:

H. Detailed SWMU or AOC information:

SWMU # _____ or AOC #3 DRUM STORAGE AREA

1. Is the unit located on a facility map? ✓Y ___N ✓A ___NA

Comments: CAPT LOIS REPORT

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ___✓N ___A ✓NA

Comments: 55 GALLON DRUMS

3. Waste characteristics (e.g. types, volumes, classification):
✓Y ___N ✓A ___NA

Comments: F002 F003 F005 APPROX 15 DRUMS/MONTH

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: _____

b. Soil: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: _____

c. Ground water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: _____

d. Surface water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/

Comments:_____

e. Subsurface gas: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/

Comments:_____

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommend no further action.

✓ Recommend a ✓SI sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in a RFI? __Y __N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:_____

b. Is the recommendation acceptable? ___Y ___N

Comments:_____

H. Detailed SWMU or AOC information:

SWMU # ____ or AOC #4 INCINERATOR

1. Is the unit located on a facility map? ___Y ✓N ___A ✓NA

Comments: _____

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ✓N ___A ✓NA

Comments: _____

3. Waste characteristics (e.g. types, volumes, classification):
___Y ___N ___A ___NA

Comments: BURNS EXHAUSTS FROM MACHINES - AIR PERMIT # 280500 3694

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: Unknown

b. Soil: ✓OR ___SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: TPH 190-12,000 PPM 43-45 PPM ANTIMONY
299 PPM ZINC
7500-19000 PPB DEHP

c. Ground water: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: BASED ON SOIL CONTAMINATION. GW FLOW NOT TOWARDS ANY OF EXISTING WELLS.
1300 PPB trans-1,2 DCE

d. Surface water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓NI

Comments: UNKNOWN

e. Subsurface gas: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓NI

Comments: BASED ON SOIL CONTAMINATION

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommend no further action.

✓ Recommend a VSI sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in a RFI? __Y __N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:

b. Is the recommendation acceptable? ✓Y ___N

Comments:

H. Detailed SWMU or AOC information:

SWMU # _____ or AOC #5 WASTE WATER TREATMENT

1. Is the unit located on a facility map? ___Y ✓N ___A ✓NA

Comments: _____

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ✓N ___A ✓NA

Comments: NON-CONTACT COOLING WATER

3. Waste characteristics (e.g. types, volumes, classification):
___Y ✓N ___A ✓NA

Comments: SPDES PERMIT # NY0140546 NOT PRESENT

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: UNKNOWN

b. Soil: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: UNKNOWN

c. Ground water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: UNKNOWN

d. Surface water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ___N/A

Comments: UNKNOWN

e. Subsurface gas: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: UNKNOWN

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommend no further action.

✓ Recommend a VSI ~~sampling~~ visit.

i. Was sampling performed as part of this RFA? ___Y ___N

ii. Will the sampling be conducted in a RFI? ___Y ___N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:

b. Is the recommendation acceptable? ___Y ___N

Comments:

I. Did the PR identify any data gaps? ✓Y ___N ___A ___NA

a. If "Y", list the data gaps: NO CLOSURE-RELATED ANALYTICAL DATA PRESENT. 1988 FILE INFO INFERS THAT AN INVESTIGATION OF SOIL/GW IS ONGOING. NO DATA PRESENTED. NO SPDES OR AIR PERMIT INFO FOUND, ALTHOUGH FACILITY HAS CURRENT PERMITS.

Comments: _____

J. Other comments on the PR: _____

RFA Component 2: Visual Site Inspection (VSI)

A. General description of VSI activities: __P X NP __A __NA

Comments: A DRIVE-BY VISUAL SITE INSPECTION ONLY WAS CONDUCTED

B. Site safety plan including the monioring of vapor emissions (respirators, chemically resistant clothing, etc.): __P __NP __A X NA

Comments: _____

C. Facility inspection:

1. Was each SWMU noted in the PR examined? __Y X N

Comments: _____

2. Was each AOC noted in the PR examined? __Y X N

Comments: _____

3. Was the entire facility traversed in order to identify additional AOC identify additinal SWMUs, complete data gaps from the PR, etc.? __Y __N __A __NA

Comments: _____

a. Were additional SWMUs and/or AOCs noted ? __Y __N

Comments: _____

4. Did the VSI include an inspection beyond the facility boundary? __Y

Comments: _____

5. SWMU # ___ or AOC NA - DRIVE-BY ONLY

a. Documentation of field observations in logbook: __P __NP __A __NA

i. Visual evidence of unit characteristics (integrity, location): __P __NP __A __NA

Comments: _____

ii. Visual evidence of waste characteristics (e.g. labels): ___ P ___ NP ___ Not applicable

Comments: _____

iii. Visual evidence of pollutant migration pathways (e.g. erosion, run-off): __P __NP

Comments: _____

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): __P __NP __Not applicable

Comments: _____

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): __P __NP __Not applicable

Comments: _____

b. Documentation of SWMU / AOC characteristics and potential migration pathways by photography? __Y __N

Comments: _____

6. Were the results of the VSI integrated with the PR to provide consistency, to complete any data gaps, and to provide the best recommendations? __Y X N

Comments: DRIVE-BY ONLY

D. Other comments on the VSI:

APPENDIX D

HISTORICAL CORRESPONDENCE

DONNELLY ENGINEERING

10 JEFFERSON AVENUE, ST. JAMES, NEW YORK 11780
TELEPHONE (516) 862-6767

LAWRENCE A. DONNELLY, P.E.
CONSULTING ENGINEER

7 November 1985

CERTIFIED R.R.R.
P 643 466 170

NYSDEC
Mr. John L. Middelkoop, P. E.
Supervisor Permit Section
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste
50 Wolf Road
Albany, NY 12233-0001

RE: FABRIC LEATHER CORPORATION, GLEN COVE, NEW YORK
EPA IDENTIFICATION NO. NYD008918450

Dear Mr. Middelkoop:

This letter is to provide your office with Engineering Certification that "Closure" of two hazardous waste underground storage tanks has been accomplished in accordance with 6NYCRR 360.8 (c)(6)(v), <currently 373-2.7(f)>.

The undersigned has received copies of certification by Larry E. Tyree Co., Inc., Farmingdale, NY and Jet-Line Services, Inc. Dover, NH, that the two, subject underground storage tanks are found to have been successfully hydrostatically leak tested, triple rinsed, scraped and cleaned. The waste rinse liquids were manifested and removed from the site for disposal by an approved method.

It is the intention of Fabric Leather Corporation to use the two subject underground storage tanks (10,000 gallons and 20,000 gallons, respectively) for storing fuel oil numbers 2, 4 or 6, which will be used in the factory boilers. With this letter, we are formally requesting the approval of NYSDEC, which will provide Fabric Leather Corporation with the proper authorization to place these tanks in service. Your early attention to this request, with written approval authorizing the use of these tanks, would be appreciated.

If you should have any questions or comments regarding the above, please do not hesitate to contact the undersigned.

Very truly yours,

DONNELLY ENGINEERING

Lawrence A. Donnelly, P. E.
LAD:ct

cc: S. Michalowski, Fabric Leather Co.

FABRIC LEATHER CORPORATION
DIVISION OF BORDEN CHEMICAL, BORDEN INC.

STEPHEN J. MICHALOWSKI
PLANT ENGINEER

March 27, 1986

Mrs. A. Gara
N.Y.S. Department of
Environmental Conservation
State University of New York
Building #40
Stony Brook, N.Y. 11794

Dear Mrs. Gara:

As per your request, enclosed is the Closure Plan for the Fabric Leather facility.

If there are any questions, please call me at any time.

Very truly yours,

Stephen J. Michalowski

Stephen J. Michalowski
Plant Engineer

SJM:MR

Enclosure

40 GARVIES POINT ROAD, GLEN COVE, NEW YORK 11542 • (516) 671-8220

FABRIC LEATHER CORPORATION

CLOSURE PLAN

I. CLOSURE PLAN

A. This facility is a vinyl manufacturing process and closure will occur as a unit.

B. The facility will close June 1, 2000. The last waste generated at this site will be on January 1, 2000.

Closure will be completed within 90 days of generating the last volume of Hazardous Waste.

C. The maximum quantity of waste in storage at any given time will not exceed process design capacities of S01 = 5,000
S02 =30,000

D. The facility equipment will be triple rinsed with an appropriate solvent. The rinsate residue will be properly disposed of as hazardous waste.

II. DRUMS

A. Residue from washing transport containers will be put into drums.

B. Empty drums in which hazardous materials have been stored will be triple rinsed with an appropriate solvent and stored in drums.

C. Leaking drums of hazardous material will be enclosed in an overpack drum for disposal.

D. All drums full or empty will be transported for proper disposal.

III. TANKS

A. (1) 20,000 gallon fuel storage tank
(1) 10,000 gallon fuel storage tank

B. Tanks will be emptied by bulk tank truck and disposed of properly.

C. Tanks will be triple rinsed, with rinsate and residue being properly disposed.

IV. COST ESTIMATES

A. Closure cost estimate $35,000

B. The cost estimates will be revised upon any change in the Closure Plan.

C. The cost estimates will be revised at least once annually on May 19th, using the inflation factor derived from the Annual Implicit Price Deflator from Gross National Product as published by the U.S. Department of Commerce in its Survey of Current Business.

FINAL CONSIDERATIONS

A. These plans will be amended upon a change in the operating plans.

B. These plans will be submitted to the Regional Administrator 180 days prior to anticipated Closure of the facility.

C. An independent registered professional engineer will be contracted to certify that the facility has been closed in accordance with the approved closure plan.

New York State Department of Environmental Conservation
(516) 751-7900

Thomas C. Jorling
Commissioner

October 24, 1988

Mr. C. Richard Springer, P.E.
Manager, Environmental Affairs
Borden Company
165 N. Washington Avenue
Columbus, Ohio 43215

Fabric Leather
NYD008991850
Close as a Generator

Dear Mr. Springer:

Pursuant to our conversation of October 4, 1988, Fabric Leather is required to undergo full closure. The regulatory basis for this requirement is found in 373-1.1(d) which deals with companies that are exempt from permitting requirements provided they comply with certain requirements. Subpart (iv) of this section pertains to Fabric leather. It states a facility is exempt from permitting providing it complies with the requirement of the subpart which, among other things, requires compliance with 373-3 (Paragraph d). It is this section which is the basis of the closure requirement. A copy of Parts 373-1 and 373-3 are enclosed for your review.

Very truly yours,

Robert A. Becherer, P.E.
Regional Hazardous
Substances Engineer

RAB:pl

Enclosures

cc: M. Taylor
A. Gara

RECEIVED

(PLM).

The results of these analyses indicated that the outer soft layer did not contain asbestos. The inner block layer, however, was found to be composed of 35 percent Amocite asbestos. Analytical results are contained in Appendix A.

Conclusions

The following conclusions are based upon the results of the environmental assessment conducted by Killam.

1. A review of plant records indicates that the Fabric Leather Facility has operated in accordance with applicable environmental regulations.

2. All nine underground storage tanks were subjected to a system integrity test and passed.

3. A comparison of the analytical results from the groundwater monitoring with those from the soil sampling indicates that the constituents present in the soil have not been detected in the groundwater.

4. Petroleum hydrocarbons, and several base/neutral organics were detected in the soil samples. The concentrations of some metals in the soil samples are higher than levels which are generally considered to be of no environmental concern.

5. No asbestos was detected in the outer soft layer of insulation around the expansion tank in the boiler room; however, the inner block layer was composed of 35 percent Amocite asbestos.

Recommendations

As a result of this study, Killam recommends the following:

1. Soils from visibly discolored or stained areas should be scraped. The removed soils should be disposed of in an appropriate manner. Soils below the scraped areas should be sampled and analyzed for parameters previously detected. Background soil samples should be collected and analyzed for the priority pollutant metals to determine the natural soil conditions for the site.

2. Current levels of volatile organic compounds in the ground water are not of environemntal concern. However, the ground water should be monitored periodically for volatile organics, base neutrals, and petroleum hydrocarbons. The purpose of

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

Henry G. Williams
Commissioner

Mr. Stephen J. Michalowski
Plant Engineer
Fabric Leather Corporation
40 Garvies Point Road
Glen Cove, New York 11542

Dear Mr. Michalowski:

Re: Fabric Leather Corporation, EPA ID. No. NYD008918450

This letter confirms receipt by this office of both owner/operator and engineering certification of closure of the referenced facility. Upon review of our records, it is deemed that all applicable regulatory requirements in conjunction with closure of the RCRA-permitted portions of the referenced facility have been met.

In order to terminate the facility's interim status, an official formal request to deny the Part B Permit for the subject facility should be made, in writing, to the U.S. Environmental Protection Agency (USEPA). Upon receipt of this request, the USEPA will then publish a Notice of Intent to deny the RCRA Part B application for your facility. Following the required comment period for this notice, you will be notified by the USEPA insofar as termination of your facility's interim status. Please note that this step is legally required in order to have the facility's interim status withdrawn.

The aforementioned request should be forwarded, within 30 days from the date of this letter to:

Mr. Richard A. Baker
Chief
Permits Adminstration Branch
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

with copies to:

Mr. Stan Siegel
Chief
Compliance and Enforcement Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

BORDEN INC
165 N. WASHINGTON AVENUE, COLUMBUS, OHIO 43215

April 17 1986

THOMAS R. HEATON
ENVIRONMENTAL SPECIALIST
ENVIRONMENTAL AFFAIRS

Mr. Richard A. Baker
Chief
Permits Administration Branch
USEPA - Region II
26 Federal Plaza
New York, NY 10278

Re: Borden Chemical,
Fabric Leather Corporation,
USEPA ID #NYD008918450

Dear Mr. Baker:

In accordance with the attached letter from New York State Department of Environmental Conservation, Borden officially requests that USEPA deny the Part B Permit for Fabric Leather Corporation. Borden has satisfactorily met all closure requirements for RCRA-TSD portions of this facility and does not pursue a final Part B permit.

Please notify this office of USEPA acknowledgement of the interim status termination. Call me at 614/225-4860 if you have any questions.

Sincerely,

Thomas R Heaton

Thomas R. Heaton

TRH/slw

cc: Mr. Stan Siegel, USEPA
Mr. John Middelkoop, P.E., NYSDEC
Mr. Robert Becherer, P.E., NYSDEC

CERTIFIED MAIL RETURN RECEIPT REQUESTED

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

Thomas C. Jorling
Commissioner

October 6, 1988

Mr. Goodger
Fabric Leather Corporation
40 Garvies Point Road
Glen Cove, NY 11542

RE: EPA Identification Number: NYD008918450

Dear Mr. Goodger:

The above referenced facility has ceased operation as a TSDF but has retained Interim Status pending an investigation. That investigation was conducted to evaluate the necessity of corrective action measures required under the Federal Hazardous and Solid Waste Amendments (HSWA) Section 3008(h). The investigation indicated that corrective action may be necessary. We are, therefore, prevented from terminating the interim status of the facility at this time.

This decision does not effect "Generator Status" under New York State Regulations and, therefore, the facility should not be subject to TSDF annual reports, TSDF regulatory fees, or closure cost assurance requirements.

Sincerely,

James Sibbald Moran, P.E.
Chief
Facility Closure Section
Bureau of Hazardous Waste Operations
Division of Hazardous Substances Regulation

cc: Herbert Mulholland, USEPA
Paul R. Counterman

APPENDIX E

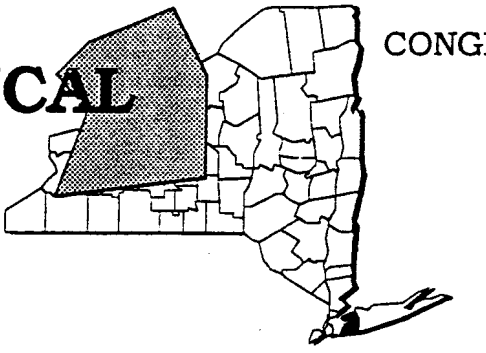
MATTIACE PETROCHEMICAL COMPANY

SUPERFUND SITE

MATTIACE PETROCHEMICAL COMPANY

NEW YORK

EPA ID# NYD000512459



REGION 2

CONGRESSIONAL DIST. 04

Nassau County

Glen Cove

Site Description

The 2 1/2-acre Mattiace Petrochemical Company site is an inactive chemical distribution facility located on Long Island. From the mid-1960s until 1987, Mattiace received chemicals by tank truck and redistributed them to its customers. The company also operated the M&M Drum Cleaning Company on the site until 1982. The site is now a graded, unpaved lot with a trailer, shed, and concrete platform with 40 storage tanks, most of which are underground. In 1980, the New York State Department of Environmental Conservation discovered that drums containing *volatile organic compounds* (VOCs) were buried on the site and that wastewater from the drum-cleaning operations was being discharged into subsurface *leaching* pools. State investigators found VOCs in soil and shallow groundwater, the local drinking water source. In 1987, after 7 years of failed negotiations and litigation, the State of New York seized the property. At that time, many drums and tanks of organics, *acid*, and alkali liquids remained. The EPA has since secured the site and removed more than 120,000 gallons of bulk or waste liquids. Surrounding the site are industrial areas, Garvies Point Preserve (designated by the State as a significant natural habitat), and tidal *wetlands*. Glen Cove Creek is 500 feet south of the site. Surface water within 3 miles downstream of the site is used for recreation.

Site Responsibility: This site is being addressed through Federal actions.

NPL LISTING HISTORY

Proposed Date: 06/24/88

Final Date: 03/30/89

Threats and Contaminants

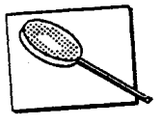
The groundwater and soil at the site are contaminated with VOCs. Exposure to contaminated water and soil through direct contact or ingestion may be a health hazard. Habitats at the Garview Point Preserve and the tidal wetlands may also be threatened by contamination.

Cleanup Approach

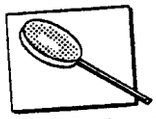
This site is being addressed in three stages: emergency actions and two *long-term remedial phases* focusing on soil and groundwater cleanup and removal of buried drums.

Response Action Status

Emergency Actions: In 1988, EPA emergency workers secured the site, collected samples, and removed 100,000 gallons of flammable liquids, 20,000 gallons of contaminated water, and 1,800 gallons of liquids containing *polychlorinated biphenyls* (PCBs). Lab packs were crushed and sent to an off-site incineration facility. Owners reclaimed cylinders and some empty tanks. All other hazardous materials were transported to EPA-approved disposal facilities.

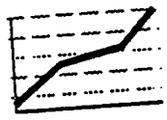


Soil and Groundwater: The EPA began a comprehensive study of soil and groundwater pollution at the site in 1988. This investigation is exploring the nature and extent of contamination problems and will result in recommendations on strategies for final cleanup. A recommendation outlining the selected remedy for soil and groundwater cleanup is scheduled for 1991.



Buried Drums: After a geophysical survey that was conducted during field work to determine soil contamination, the EPA found several buried drums on the site. The EPA initiated field work in 1990 specifically geared to investigate the contents of the drums. Recommendations outlining the remedy selected to clean up the buried drums are scheduled to be submitted in late 1990.

Environmental Progress



By securing the site and removing contaminated liquids, the EPA has eliminated immediate threats to nearby residents and the environment while further investigations leading to the selection of final cleanup remedies are taking place at the Mattiace Petrochemical Company site.

PRELIMINARY RCRA FACILITY ASSESSMENT
FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Air and Waste Management Division
26 Federal Plaza
New York, New York 10278

Work Assignment:	R02040
EPA Region:	II
EPA Site/Facility I.D. No.:	NYD008918450
Contract No.:	68-W9-0003 (TES-6)
TRC Document No.:	NY-R40.RP7
TRC Project No.:	1-636-393-3-2000-0
TRC Project Manager:	Michael F. Clark, P.E.
Telephone No.:	(212) 349-4616
Subcontractor No.:	N/A
Subcontractor Project Manager:	N/A
Telephone No.:	N/A
EPA Work Assignment Manager:	John Nevius
Telephone No.:	(212) 264-9578
Date Prepared:	October 6, 1993

TRC ENVIRONMENTAL CORPORATION
291 Broadway, Suite 1206
New York, New York 10007
(212) 349-4616

TRC

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TABLE OF CONTENTS

TABLES

FIGURES

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1.0 INTRODUCTION

TRC Environmental Corporation (TRC - formerly Alliance Technologies Corporation) was requested by the U.S. Environmental Agency (EPA) under EPA Contract No. 68-W9-0003 (TES-6), Work Assignment No. R02040, to perform a Preliminary RCRA Facility Assessment (RFA) of the Fabric Leather Corporation (Fabric Leather) facility in Glen Cove, New York (EPA I.D. No. NY0008918450). Tasks were performed in accordance with the Preliminary RFA Scope of Work provided by EPA on June 8, 1993, and TRC's Work Plan, dated July 14, 1993.

The purpose of the Preliminary RFA is to identify, gather information on, and evaluate the potential for releases to the environment from areas of concern (AOCs), including solid waste management units (SWMUs) and areas where releases may have occurred in the past. In addition, the Preliminary RFA will provide information for EPA use in the ranking of this facility using the National Corrective Action Prioritization System (NCAPS).

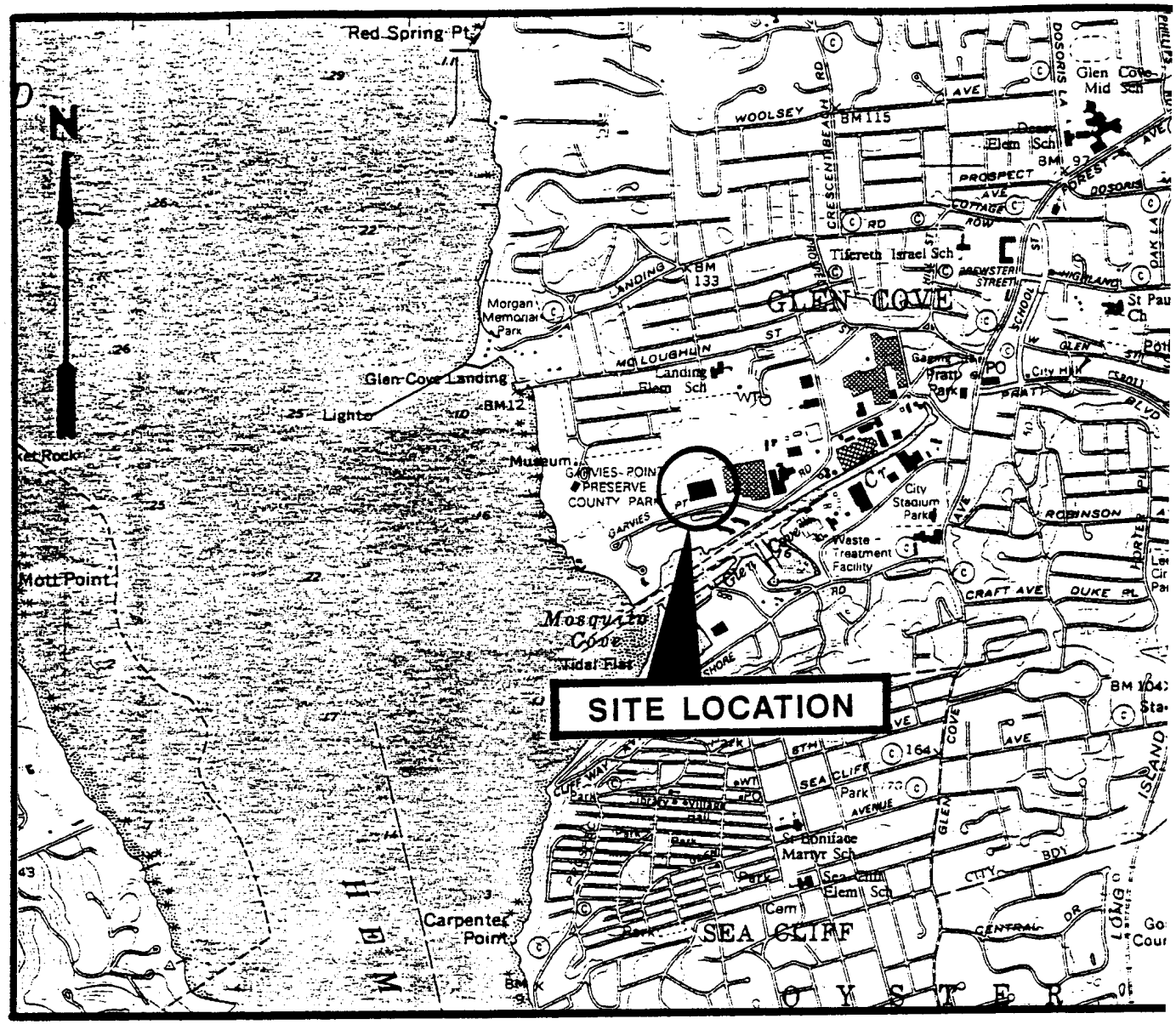
Background information for this Interim Preliminary RFA Report was obtained through file searches conducted at the New York State Department of Environmental Conservation (NYSDEC), Albany, New York, Bureau of Hazardous Waste Facility Compliance, Bureau of Wastewater Facilities Design, and the Bureau of Air Application, Review and Permitting.

A review of EPA files was not conducted, at the request of the Work Assignment Manager (WAM).

2.0 FACILITY DESCRIPTION

The Fabric Leather facility is located at 40 Garvies Point Road in Glen Cove, Suffolk County, New York (Figure 1). The facility consists of a factory/warehouse/office building and a parking lot (Figure 2). Information regarding block and lot number as well as lot size was not available during the preliminary NYSDEC file review. A Visual Site Inspection (VSI) conducted on September 1, 1993 noted "For Lease" signs on the property as well as signs indicating that Fabric Leather is or was a subsidiary of Borden Chemical. No activity was noted on the property at the time of the VSI (TRC, 1993). This VSI was a "drive-by" inspection; TRC personnel did not physically enter the Fabric Leather property.

Fabric Leather began manufacturing expanded vinyl (imitation leather) in 1966. Processes included mixing polyvinyl chloride resin with solvents. The facility was closed in 1988 (NYSDEC, 1988a).



SCALE 1:24000

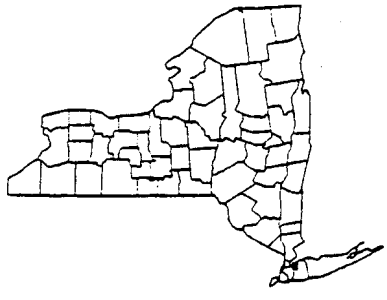
1 0 1 MILE

1/2

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

1991 magnetic declination is approximately 13.5° West



QUADRANGLE LOCATION

SOURCE: USGS 7.5 MINUTE TOPOGRAPHIC MAP QUADRANGLE, SEA CLIFF, N.Y.

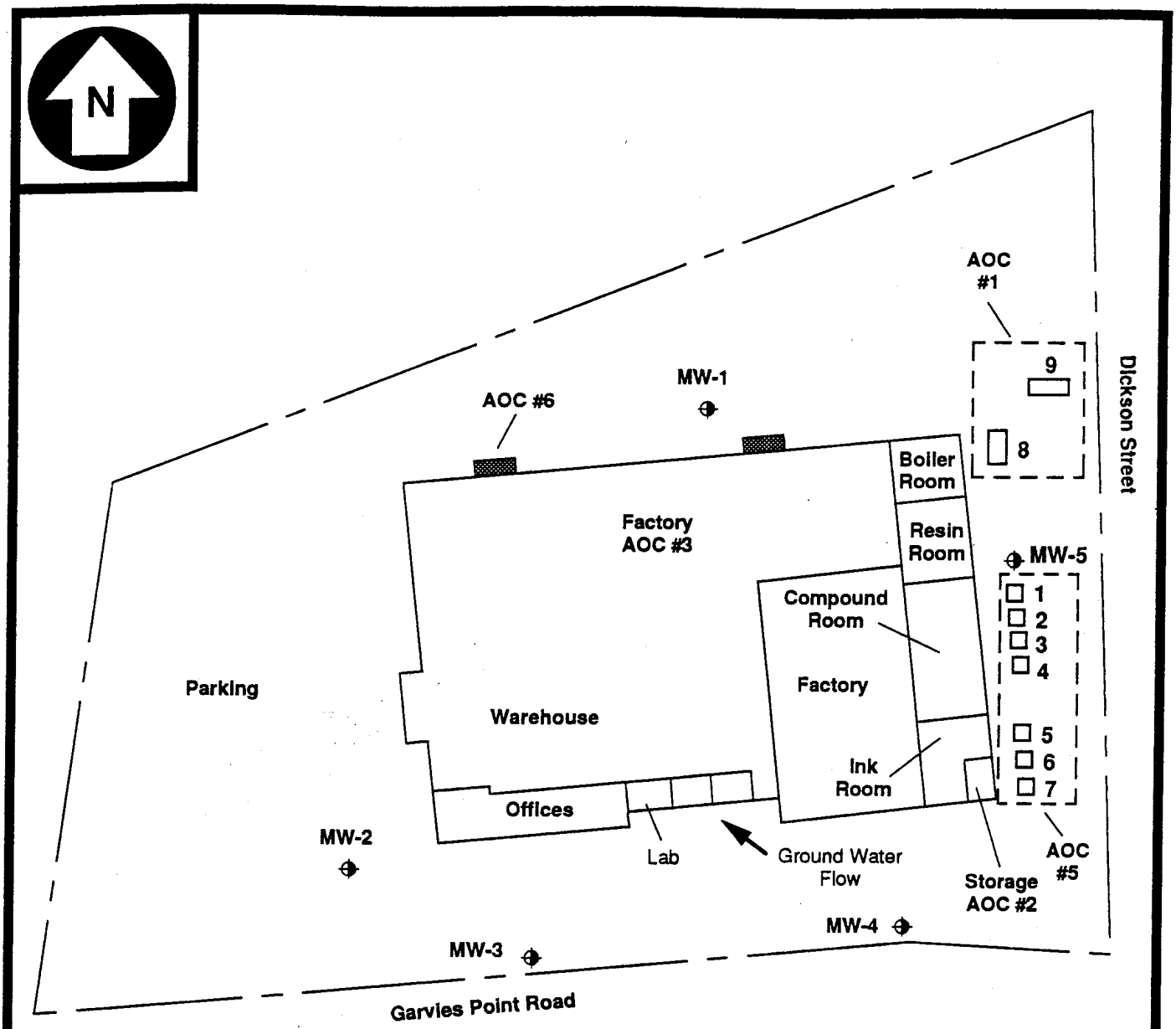
TRC Environmental Corpora
TRC 18 Worlds Fair Drive
Somerset, N.J. 08873

FABRIC LEATHER CORPORATION
40 GARVIES POINT ROAD
GLEN COVE, N.Y.

SITE LOCATION MAP

Date: 8-26-93	Proj.# 1-635-393	Fig

WORK ASSIGNMENT NO. R02



Key

⊕	Approximate Location of Ground Water Monitoring Well (screened interval unknown)
☐ 1-3	5,000 gallon USTs
☐ 4	2,500 gallon UST
☐ 5-7	1,500 gallon USTs
☐ 8	10,000 gallon UST
☐ 9	20,000 gallon UST

Compiled From: A.H. Salkowitz, Jamaica, New York and Killam Associates, Consulting Engineers

Not to Scale

FACILITY PLAN

FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK

TRC

Figure 2.

MS73/1

Six Areas of Concern (AOCs) were identified during the preliminary file review. Table 1 outlines the currently known AOCs at Fabric Leather and Figure 2 depicts the approximate location of AOCs #1, #2, #5, and #6.

AOC #1 is an area east of the facility building consisting of a 20,000 gallon underground storage tank (UST) and a 10,000 gallon UST. These tanks were previously used to store solvents and blended petroleum products which were apparently then incinerated for heating purposes at the facility. However, it is not known whether solvents were blended with the petroleum products, or whether they were stored in a separate tank. Similarly, it is not known if solvents were incinerated for heating, or if only blended petroleum was used. These two tanks were emptied and closed in accordance with 6 NYCRR Part 360 in 1985 (NYSDEC, 1988a).

AOC #2 is an indoor hazardous waste storage area located in the southeast corner of the facility building which was used to store solvents for less than 90 days. Wastes included solvents containing methylene chloride (F003), solvents containing toluene and naptha (F002), and resins contaminated with the above solvents (F005) (NYSDEC, 1988a).

AOC #3 is an incinerator (location unknown) which was used to burn exhaust from machines via an air permit. The incinerator apparently replaced an electrostatic precipitator (NYSDEC, 1988a).

AOC #4 is a discharge (location unknown) for non-contact cooling water (Permit #NY0140546) (NYSDEC, 1988a).

AOC #5 consists of an area east of the facility building where three 5,000-gallon USTs, one 2,500-gallon UST and three 1,500-gallon USTs are or were located. No information is available regarding the present or previous contents of these tanks (NYSDEC, 1988b).

AOC #6 is the ESP/incinerator stained soil area in the vicinity of Sample 6 collected by Killam Associates in 1988. This area was found to contain phthalates at concentrations as high as 380,000 milligrams per kilogram. Some soil was excavated and an asphalt seal was installed. The area appears to be associated with a release from the electrostatic precipitator and incinerator.

3.0 FACILITY ACTIVITY/HISTORY

Fabric Leather occupied the facility between 1966 and approximately 1988 (NYSDEC, 1988). The property is reportedly part of an old dump which was active prior to 1966, a portion of which is a Superfund site located approximately 100 yards from the Fabric Leather property. No further information regarding this dump or other previous history of the property was found during the Preliminary Review.

TABLE 1. AREAS OF CONCERN

AOC No.	Description	Start-up/ Closure Dates	Release Status	Reference	Medium/ Compounds Detected	Off-site Migration Potential
1	1 20,000-gallon underground storage tank (UST) 1 10,000-gallon UST East of Facility Bldg.	Unknown/ 1985	Potential release	NYSDEC, 1988a NYSDEC, 1988b	Ground water/ Chlorinated solvents	High - ground water is contaminated
2	Indoor Hazardous Waste Storage Area	1966 (?) 1988	Unknown	NYSDEC, 1988a	N/A	Unknown - No information available
3	Incinerator (location unknown)	Unknown/ 1988	Unknown	NYSDEC, 1988a	N/A	Unknown - No information available
4	Former discharge (location unknown) for non-contact cooling water	Unknown/ 1988	Unknown	NYSDEC, 1988a	N/A	Unknown - No information available
5	3 5,000-gallon USTs 1 2,500-gallon UST 3 1,500-gallon USTs	Unknown/ Unknown	Potential release	NYSDEC, 1988a NYSDEC, 1988b	Ground water/ Chlorinated solvents	High - ground water is contaminated
6	ESP/Incinerator Stained Soil Area	1966/ Unknown	Documented Release	Killam, 1988	Soil/phthalates, metals	Low; source was removed, area was capped.

The facility manufactured expanded vinyl (imitation leather) by mixing polyvinyl chloride resin with solvents. Wastes, including methylene chloride, toluene, naphtha, and contaminated resins, were generated from roller washing operations and from the electrostatic precipitator. In 1988, wastes were stored in drums (NYSDEC, 1988a). No further information regarding facility operations or waste streams generated was located by TRC during the Preliminary Review.

In 1985 the two USTs at AOC #1 underwent closure in accordance with 6NYCRR 360.8(c)(6)(v). Each tank was hydrostatically leak tested, triple rinsed, scraped and cleaned. Waste rinse liquids were manifested and removed from the facility (Donnelly, 1985). After closure, these tanks were used to store No. 2 fuel oil for heating the onsite building (Donnelly, 1986).

On March 27, 1986 Fabric Leather submitted a Closure Plan to the NYSDEC. This Closure Plan stated that the facility would close on June 1, 2000 (Borden, 1986a), however, currently Fabric Leather no longer operates at this location and it is not known whether the Closure Plan was approved.

On April 2, 1986, NYSDEC informed Fabric Leather that its office had received engineering certification of closure for the Fabric Leather facility and that all applicable regulatory requirements had been met for RCRA-permitted portions of the facility. NYSDEC further stated that Fabric Leather was required to submit a formal request to the EPA to deny their Part B permit in order to terminate the facility's interim status (NYSDEC, 1986). Fabric Leather submitted this request on April 17, 1986 (Borden, 1986b).

On October 6, 1988, NYSDEC notified Fabric Leather that their Interim Status was being retained pending an investigation which was being performed to evaluate the necessity of corrective action measures required under the Federal Hazardous and Solid Waste Amendments (HSWA) Section 3008(h) (NYSDEC, 1988c).

On October 24, 1988, NYSDEC informed Fabric Leather that the facility was required to undergo full closure (NYSDEC, 1988d). Further information regarding facility closure and shut-down was not found during the Preliminary Review.

On November 11, 1988, Killam Associates, Consulting Engineers completed a site inspection report for Fabric Leather. Five ground water monitoring wells were installed and sampled and six surface soil locations were sampled and analyzed for volatile organic compounds, base-neutral/acid extractables, polychlorinated biphenyls, pesticides and metals. Laboratory data indicates that ground water sampled from MW-1 contained 8.8 micrograms per liter (µg/l) 1,1-dichloroethane, 16 µg/l 1,1-dichloroethylene, 5.3 µg/l methylene chloride, and 1,200 µg/l 1,1,1-trichloroethane. Samples from MW-5 contained 170 µg/l tetrachloroethylene, 22 µg/l trichloroethylene and 7.2 µg/l cis-1,2-dichloroethylene (NYSDEC, 1988b). Soil samples were found to contain metals, including antimony as high as 59 milligrams per kilogram (mg/kg)

(Sample 4); copper as high as 21.5 mg/kg (Sample 6); lead as high as 23 mg/kg (Sample 4), and thallium as high as 22 mg/kg (NYSDEC, 1988b). In addition, in Sample 6 base-neutral/acid extractables (BNAs) were detected in soils at concentrations as high as 380,000 µg/kg of bis(2-ethylhexyl)phthalate, and 120,000 µg/kg of butyl benzene phthalate. Analytical data including sampling locations and laboratory analytical results from this event are presented in Appendix B.

Based on the analytical data, Killam recommended that soils from the visibly discolored areas (presumably around samples 2 through 6) be removed (Killam, 1988). In addition to chemical contamination, Killam noted that at least one boiler tank was lined with asbestos containing material (35 percent Amocite asbestos) (Killam, 1988).

According to undated diagrams located in the NYSDEC files reviewed by TRC, soil was excavated in the area of sample 6, which may have been associated with the electrostatic precipitator and the incinerator. The figures are presented in Appendix A.

4.0 ENVIRONMENTAL SETTING

Geologically, Long Island forms the Ronkonkama terminal moraine, which, along the northern shore, consists of sand, gravel, and clay to a depth of approximately 250 feet below ground surface (Hang and Salvo, 1980). The Site Investigation conducted by Killam Associates indicates that ground water flows to the northwest (NYSDEC, 1988b). Ground water in the area is no longer used for drinking water. Two municipal wells located approximately one mile from Fabric Leather were closed due to contamination in the 1970s (TRC, 1993).

5.0 PRELIMINARY EVALUATION

Preliminary information for this interim evaluation was provided in Table 1. Analytical data from Killam's Site Investigation conducted in 1988 indicate that ground water at the Fabric Leather property is contaminated with chlorinated solvents. Soils collected from visibly stained areas were found to contain phthalates at concentrations as high as 380,000 mg/kg. Based on information presented in undated figures, one of these areas was associated with the electrostatic processor and incinerator. The area was partially remediated. No other information regarding remedial activities was located by TRC in the available files.

Limited information was located in the state files. In addition, the VSI consisted only of a drive-by. Due to the lack of sufficient information, TRC believes that further sampling and environmental investigations should be conducted at the Fabric Leather property.

6.0 SUMMARY

Fabric Leather is located at 40 Garvies Point Road in Glen Cove, New York. Fabric Leather manufactured expanded vinyl (imitation leather) at the facility from 1966 to approximately 1988. Processes included mixing polyvinyl chloride resin with solvents.

Six AOCs have been identified at the facility including a 20,000 gallon UST and a 10,000 gallon UST. Prior to 1985, these tanks were used to store solvents and blended petroleum products which were apparently then incinerated for heating purposes at the facility. In 1985, the two USTs underwent closure procedures and were then used to store No. 2 fuel oil for heating the facility building. In 1988, a site investigation was conducted by Killam Associates, Consulting Engineers. Four ground water monitoring wells were installed and sampled, and six soil samples were collected. Analytical data from the event indicates that ground water flows southeast to the northwest and is contaminated with chlorinated solvents. Soils were found to be contaminated with phthalates and metals.

Subsequent to closure of its RCRA-permitted facility operations, Fabric Leather requested that EPA terminate its Interim Status under RCRA. On October 6, 1988, the NYSDEC notified Fabric Leather that their interim status was being retained pending on investigation to determine the need for corrective action under the HSWA.

Based on the available information, releases have occurred from the facility. Sampling previously conducted by Killam Associates is inadequate to fully characterize the extent of contamination.

REFERENCES

Borden, 1986a. Letter to Mrs. A. Ga ra, NYSDEC, RE: Closure Plan for Fabric Leather Corporation. Fabric Leather Corporation, Division of Borden Chemical, Borden, Inc., March 27.

Borden, 1986b. Letter to Mr. Richard A. Baker, Chief, Permits Administration Branch, USEPA - Region II, RE: Request to deny Part B Permit for Fabric Leather Corporation. Borden, Inc., April 17.

Donnelly, 1985. Letter to Mr. John L. Middelkoop, P.E., NYSDEC, regarding UST Closure at Fabric Leather Corporation, Glen Cove, New York. Donnelly Engineering, November 7.

Donnelly, 1986. Letter to Permits Administrator, NYSDEC, Region I, regarding Fabric Leather Corporation, Division of Borden Chemical. Donnelly Engineering, February 19.

Hang and Salvo, 1980. Toxics on Tap; contamination of Long Island's Drinking Water Supplies, 1980.

Killam, 1988. Report for Site Inspection of the Fabric Leather Facility. Conducted by Killam Associates for Fabric Leather. November 11.

NYSDEC, 1986. Letter to Mr. Stephen J. Michalowski, Fabric Leather Corporation, RE: Certification of Closure. New York State Department of Environmental Conservation, April 2.

NYSDEC, 1988a. Capt Lois Site Visit for Fabric Leather Corporation, Glen Cove, NY, NYD008918450. New York State Department of Environmental Conservation, September 30.

NYSDEC, 1988b. Memo regarding Garvies Point Condominiums - Data from Environmental Survey at Fabric Leather. New York State Department of Environmental Conservation, October 4.

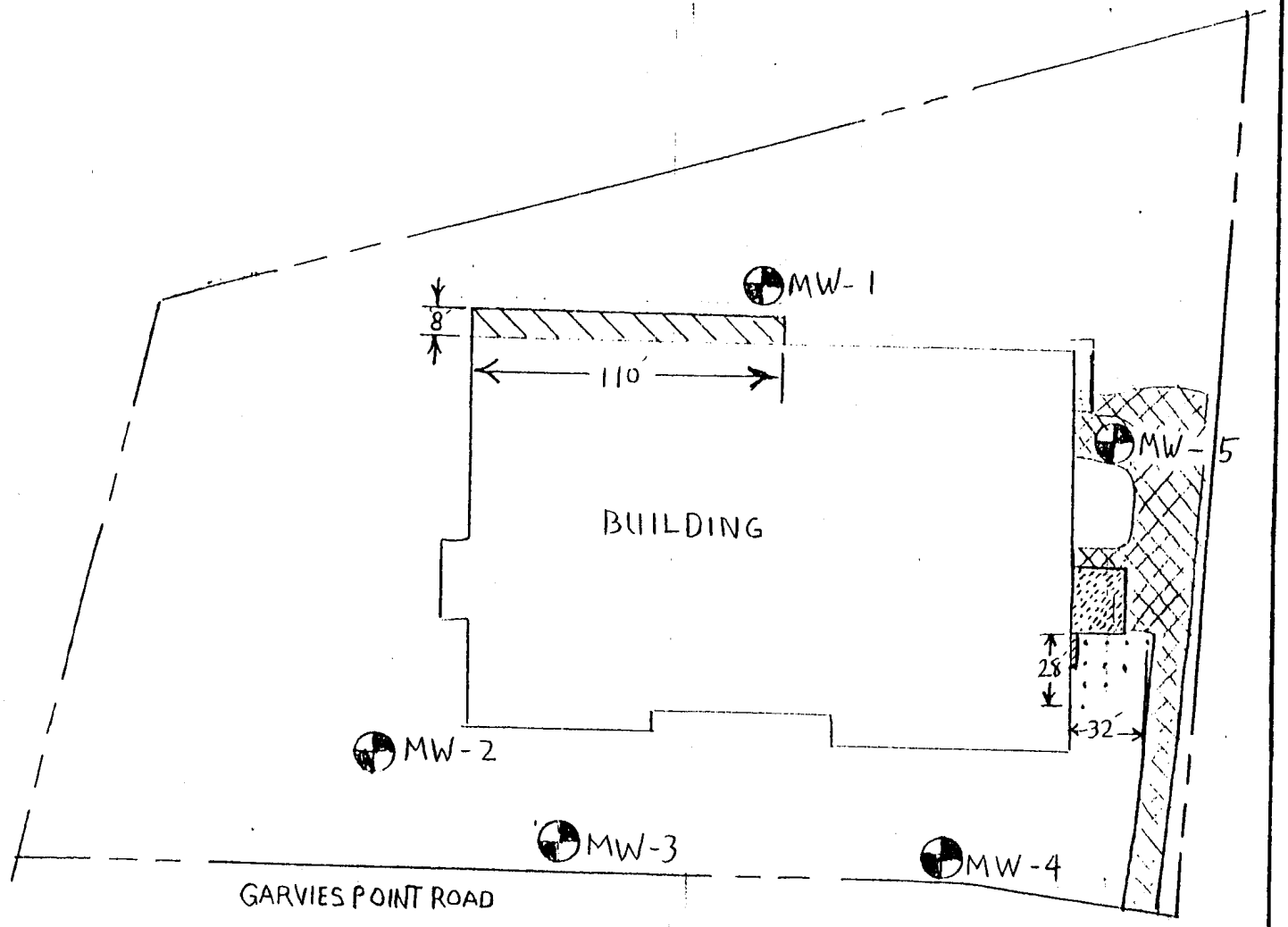
NYSDEC, 1988c. Letter to Mr. Goodger, Fabric Leather Corporation, RE: Retention of Interim Status Classification. New York State Department of Environmental Conservation, October 6.

NYSDEC 1988d. Letter to Mr. Richard Springer, P.E. Borden Company, RE: Full Closure Requirement, Fabric Leather Corporation. New York State Department of Environmental Conservation, October 24.

TRC, 1993. Communication between M. Clark, TRC, and M. Martino, Glen Cove Water Superintendent. September 20.

APPENDIX A

FIGURES



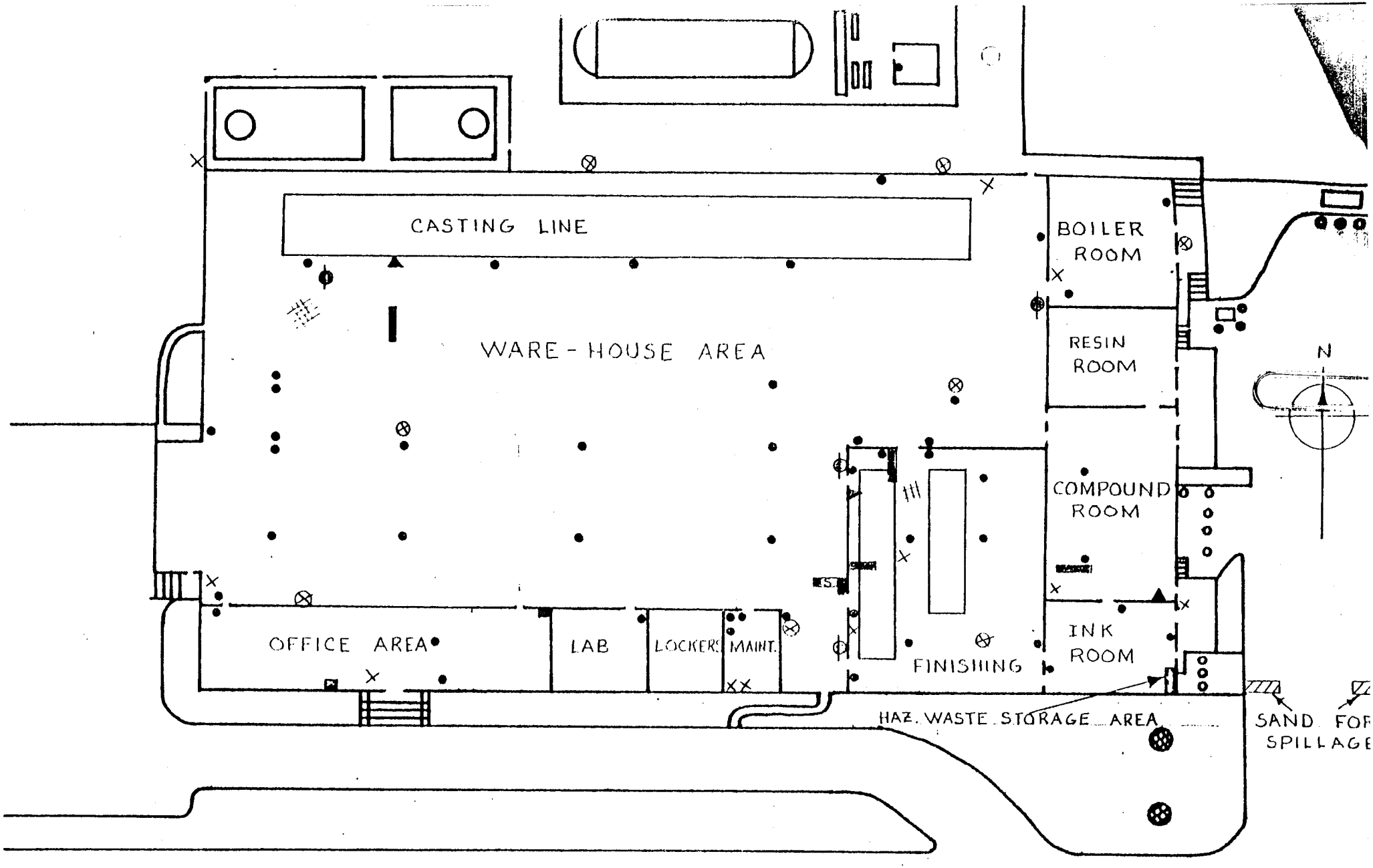
LEGEND

- MONITORING WELL
- ENCAPSULATING ASPHALT
- DRIVEWAY
- LOADING DOCK
- PRESSURE GROUT POINTS

N

E

OBJECT: FABRIC LEATHER BORDEN, INC	SCALE: NOT TO SCALE	DRAWN BY: PETER F. PAUL
ADDRESS: 40 GARVIES PT RD	DRAWN: 11/25/92	PUBLIC HEALTH SANITARIAN
	OBSERVED: 10/6/92	FOR: NASSAU COUNTY



● FIRE EXTINGUISHER ⊗ FIRE HOSE ⊕ SCOTT PACKS ▲ EYE WASH AND SHOWER FIRE BLANKET STRETCHER

EMERGENCY OXYGEN X TELEPHONE

HAZARD WASTE LOCATION

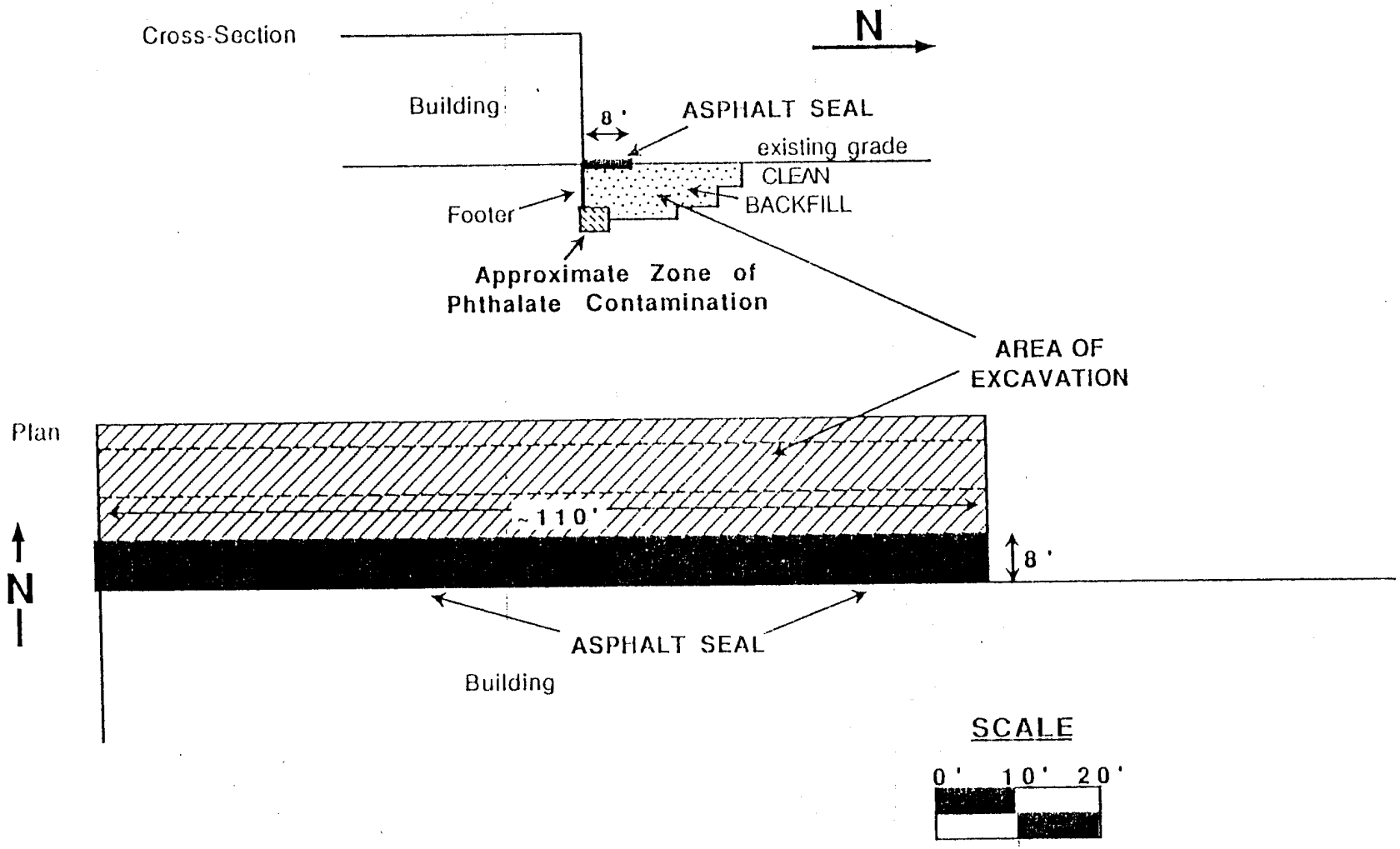
FABRIC LEATHER CORPORATION

EMERGENCY EQUIPMENT

BORDEN, INC. - GLEN COVE, NEW YORK

FIGURE 1

ESP/INCINERATOR EXCAVATION
AREA SEALED BY ASPHALT

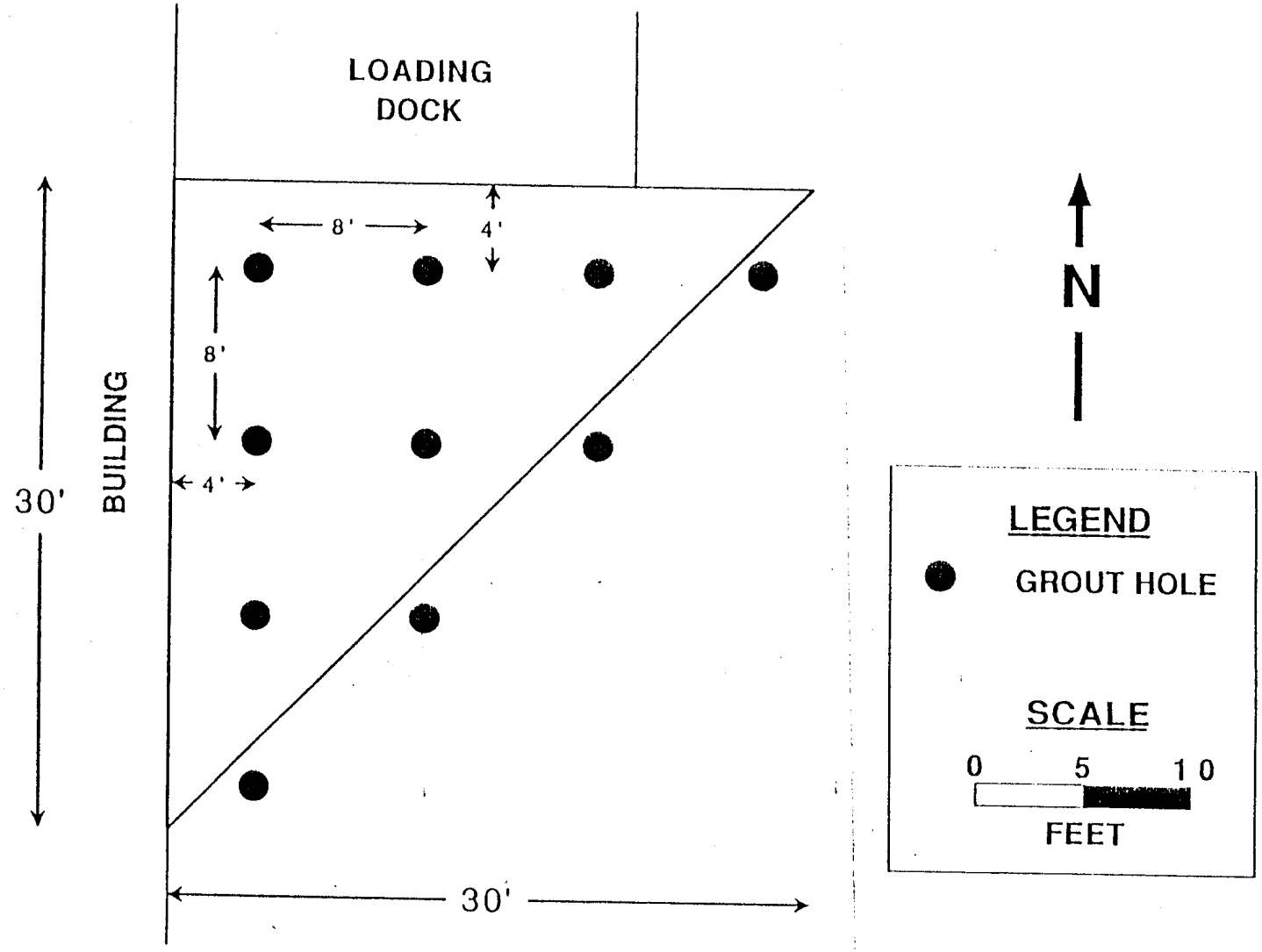


T.M. GATES, INC.

BORDEN, INC. - GLEN COVE, NEW YORK

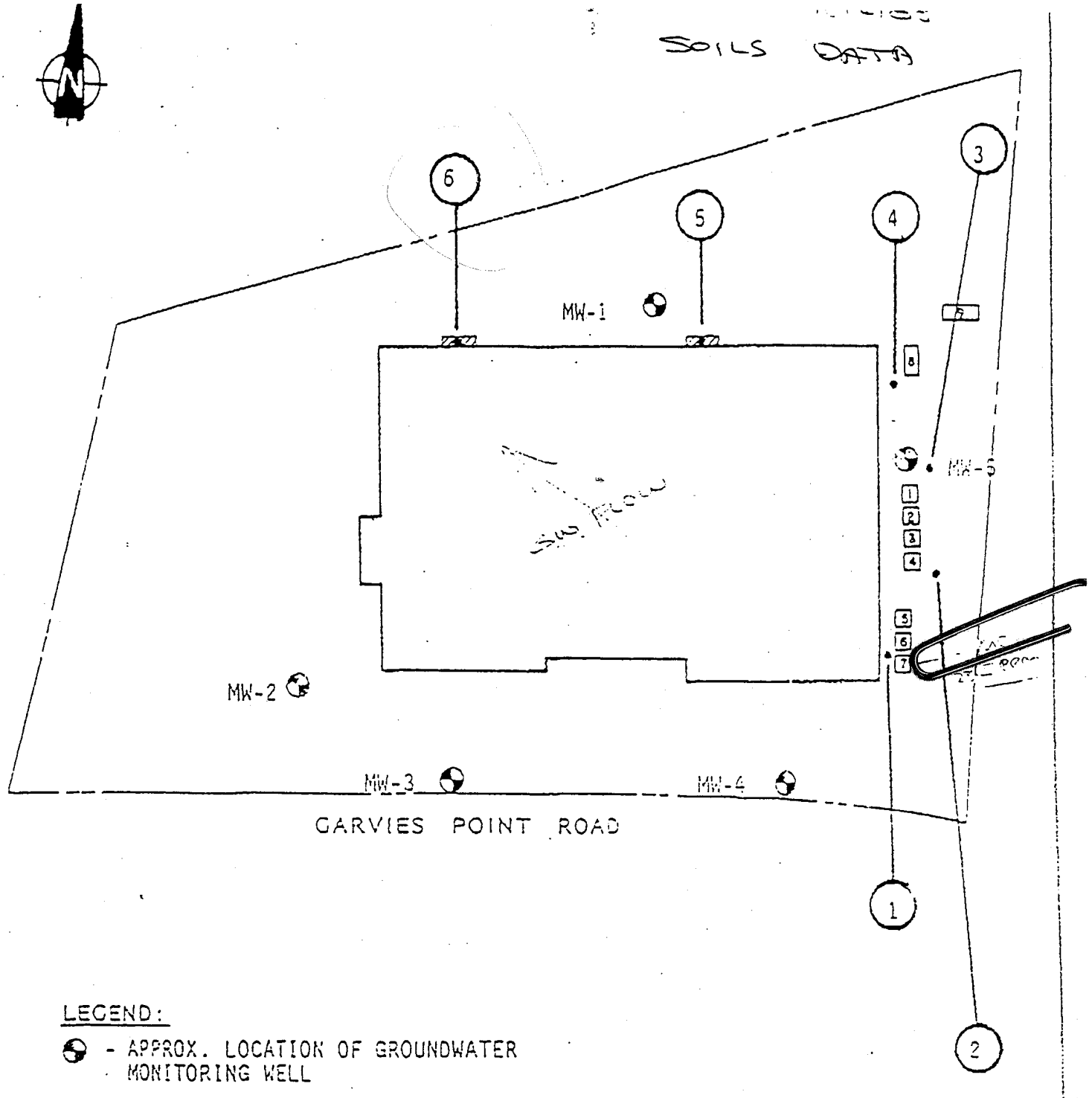
FIGURE 2

PRESSURE GROUTING PLAN



T.M.GATES, INC.

SOILS DATA



LEGEND:

- APPROX. LOCATION OF GROUNDWATER MONITORING WELL

1-3 - 5,000 GAL. U.S.T.

4 - 2,500 GAL. U.S.T.

5-7 - 1,500 GAL. U.S.T.

8 - 10,000 GAL. U.S.T.

9 - 20,000 GAL. U.S.T.

(1) LOCATION AND NUMBER OF SOIL SAMPLE

FIGURE 1

SAMPLING LOCATIONS
FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK

SITE PLAN

SCALE: 1" = 100'±

DeKillam

APPENDIX B

KILLAM, 1988 SOIL AND GROUND WATER DATA

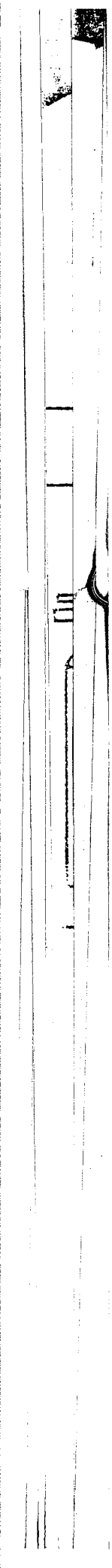


Table I

Sample Locations at Fabric Leather Corp.
Glen Cove, New York

Sample No.	Location *	Description	Depth	
1134-6001	1	near southeast corner of building	12 in.	
1134-6002	2	eastside of building	9 in.	
1134-6003	3	adjacent to garbage dumpster	9 in.	
1134-6004	4	eastside of building between north loading dock & boiler room door	9 in.	
1134-6005	5	northside of building 2130 ft. west of northeastern corner	surficial	
1134-6006	5	same as above	12 in.	
1134-6007	6	between incinerator & northside of the building	surficial	
1134-6008	6	same as above	12 in.	
1134-1005	NA	NA	NA	trip blank
1134-1006	NA	NA	NA	trip blank

* Numbers correspond to locations on Figure 1

Killam
Associates : Consulting Engineers

Table 2

RESULTS OF AUGUST, 1988 SOIL SAMPLING
FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK
KILLAM JOB NO. 156200

CONSTITUENT	1134-1005	1134-1006	1134-6001	1134-6002	1134-6003	1134-6004	1134-6005	1134-6006	1134-6007	1134-6008
PEC (MG/KG)	-	<4.0	12000	1200	<21	450	12000	330	12000	190
METALS (MG/KG)										
Antimony	**	0.2	51	35	31	59	40	53	43	45
Arsenic	**	0.01	5.7	5.5	3.6	3.7	4.7	5.6	5.5	5.6
Beryllium	**	0.02	0.38	0.32	0.70	0.91	0.30	0.38	0.71	0.51
Cadmium	**	0.01	2.0	3.2	2.3	5.0	1.6	1.3	2.1	1.4
Chromium	**	0.05	9.3	9.2	7.3	7.4	18	13	13	7.7
Copper	**	0.02	11.0	3.30	6.60	10.5	18.5	9.7	21.5	7.70
Lead	**	0.1	19.5	9.2	10.5	23.6	41	12	13	13.5
Mercury	**	**	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
Nickel	**	0.04	13	12	13	26	18	16	17	13
Selenium	**	0.002	0.057	0.032	0.052	0.075	0.05	0.077	0.051	0.032
Silver	**	[illegible]	0.57	0.11	0.15	1.1	0.15	0.38	0.16	0.16
Thallium	**	0.1	8.7	12	12	22	8.5	12	16	8.3
Zinc	**	0.16	30.4	25.5	15.5	28.8	156	22.5	187	259
VOLATILE ORGANICS (UG/KG)										
Benzene	-	**	-	-	-	-	**	-	**	-
Tetrachloroethene	-	**	-	-	-	-	**	-	**	-
Toluene	-	**	-	-	-	-	**	-	**	-
Ethylbenzene	-	**	-	-	-	-	**	-	**	-
Carbon Tetrachloride	-	**	-	-	-	-	**	-	**	-
Chlorobenzene	-	**	-	-	-	-	**	-	**	-
Chloroform	-	**	-	-	-	-	**	-	**	-
Trichlorofluoromethane	-	**	-	-	-	-	**	-	**	-
1,2-Dichloroethane	-	**	-	-	-	-	**	-	**	-
1,1,1-Trichloroethane	-	**	-	-	-	-	**	-	**	-
Bromodichloromethane	-	**	-	-	-	-	**	-	**	-
1,3-Dichlorobenzene	-	**	-	-	-	-	**	-	**	-
1,2-Dichlorobenzene	-	**	-	-	-	-	**	-	**	-
1,4-Dichlorobenzene	-	**	-	-	-	-	**	-	**	-
1,1-Dichloroethane	-	**	-	-	-	-	**	-	**	-
1,2-Dichloroethane	-	**	-	-	-	-	**	-	**	-
1,1-Dichloroethene	-	**	-	-	-	-	**	-	**	-
trans-1,2-Dichloroethene	-	**	-	-	-	-	**	-	**	-
1,2-Dichloropropane	-	**	-	-	-	-	**	-	**	-
cis-1,3-Dichloropropene	-	**	-	-	-	-	**	-	**	-
trans-1,3-Dichloropropene	-	**	-	-	-	-	**	-	**	-
Ethyl Benzene	-	**	-	-	-	-	**	-	**	-
Methylene Chloride	-	**	-	-	-	-	**	-	**	-
1,1,2,2-Tetrachloroethane	-	**	-	-	-	-	**	-	**	-
Tetrachloroethene	-	**	-	-	-	-	**	-	**	-
Toluene	-	**	-	-	-	-	**	-	**	-
1,1,1-Trichloroethane	-	**	-	-	-	-	**	-	**	-
1,1,2-Trichloroethane	-	**	-	-	-	-	**	-	**	-
Trichloroethene	-	**	-	-	-	-	**	-	**	-
Vinyl Chloride	-	**	-	-	-	-	**	-	**	-
TOTAL VOA TIC (UG/KG)	-	**	225300	-	-	-	**	-	**	-
PESTICIDES/PCB's (UG/KG)	**	-	-	-	-	5300	-	-	-	-
ACID EXTRACTABLES (UG/KG)										
Phenol	**	-	-	-	-	-	-	-	-	-
2-Chlorophenol	**	-	-	-	-	-	-	-	-	-
2-Nitrophenol	**	-	-	-	-	-	-	-	-	-
2,4-Dimethylphenol	**	-	-	-	-	-	-	-	-	-
2,4-Dichlorophenol	**	-	-	-	-	-	-	-	-	-
4-Chloro-3-methyl Phenol	**	-	-	-	-	-	-	-	-	-
2,4,6-Trichlorophenol	**	-	-	-	-	-	-	-	-	-
2,4-Dinitrophenol	**	-	-	-	-	-	-	-	-	-
4-Nitrophenol	**	-	-	-	-	-	-	-	-	-
2-Methyl-4,6-Dinitrophenol	**	-	-	-	-	-	-	-	-	-
Pentachlorophenol	**	-	-	-	-	-	-	-	-	-

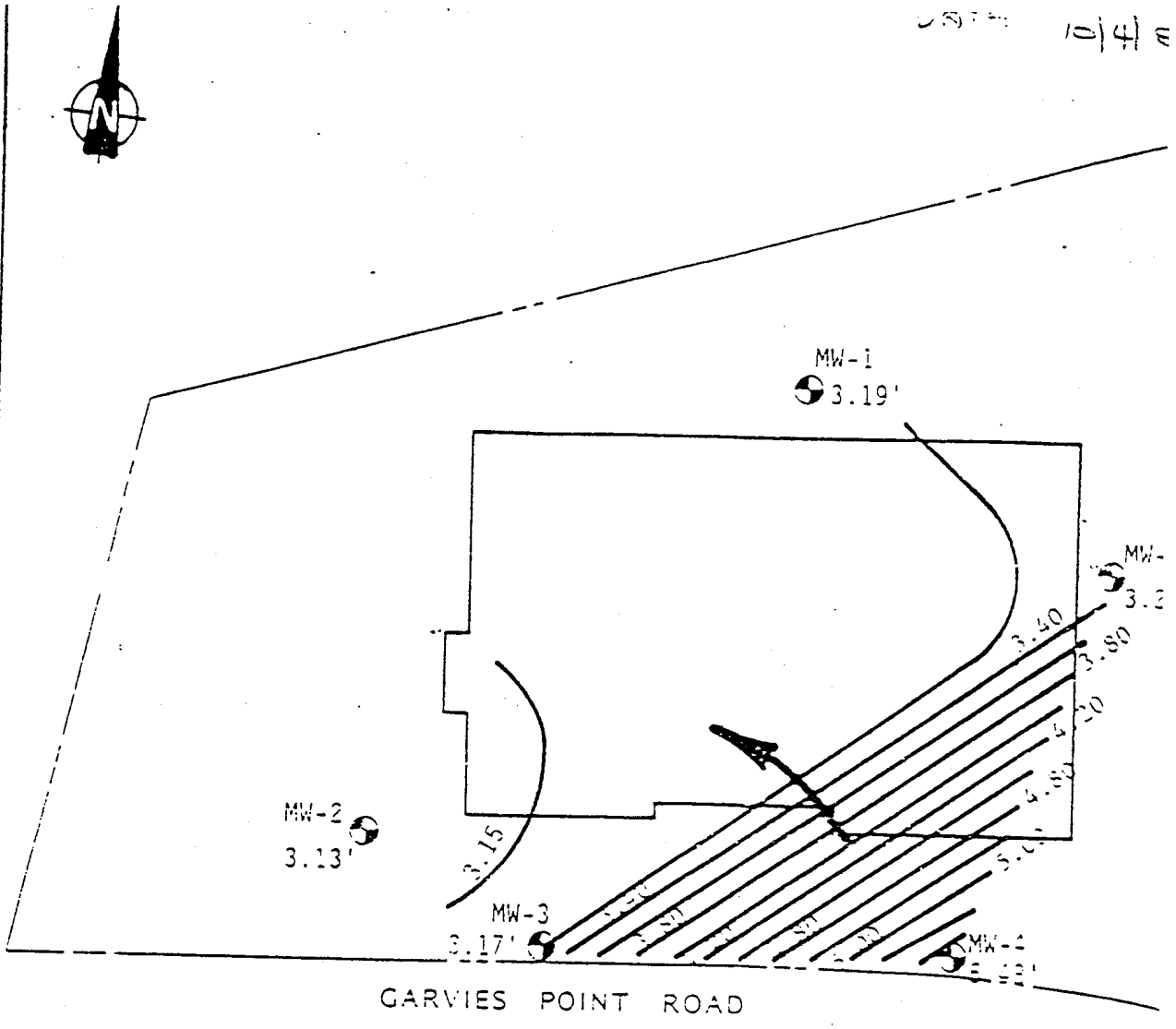
Killam Associates · Consulting Engineers

Table 2 (cont'd)

RESULTS OF AUGUST, 1988 SOIL SAMPLING
FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK
KILLAM JOB NO. 156268

CONSTITUENT	1134-1005	1134-1006	1134-6001	1134-6002	1134-6003	1134-6004	1134-6005	1134-6006	1134-6007	1134-6008
BASE NEUTRAL EXTRACTABLES (UG/KG)										
Acenaphthene	NA	-	-	-	-	-	-	-	-	-
Acenaphthylene	NA	-	-	-	-	-	-	-	-	-
Anthracene	NA	-	-	-	-	-	-	-	-	-
Benzo (a) Anthracene	NA	-	-	-	-	500	-	-	-	-
Benzo (a) Pyrene	NA	-	-	-	-	2100	-	-	-	-
Benzo (b) Fluoranthene	NA	-	-	-	-	2800	-	-	-	-
Benzo (g,h,i) Perylene	NA	-	-	-	-	1600	-	-	-	-
Benzo (k) Fluoranthene	NA	-	-	-	-	2000	-	-	-	-
bis (2-Chloroethoxy) Methane	NA	-	-	-	-	-	-	-	-	-
bis (2-Chloroethyl) Ether	NA	-	-	-	-	-	-	-	-	-
bis (2-Chloroisopropyl) Ether	NA	-	-	-	-	-	-	-	-	-
bis (2-ethyl hexyl) Phthalate	NA	-	-	66000	2300	7600	220000	750	210000	7500
4-Bromophenyl-Phenyl Ether	NA	-	-	-	-	-	-	-	-	-
Butyl Benzyl Phthalate	NA	-	-	-	-	-	-	-	-	-
2-Chloronaphthalene	NA	-	-	-	-	2800	12000	-	120000	4200
4-Chlorophenyl-Phenyl Ether	NA	-	-	-	-	-	-	-	-	-
Chrysene	NA	-	-	-	-	-	-	-	-	-
Dibenzo (a,h) Anthracene	NA	-	-	-	-	3400	-	-	-	-
1,2-Dichlorobenzene	NA	-	-	-	-	660	-	-	-	-
1,3-Dichlorobenzene	NA	-	-	-	-	-	-	-	-	-
1,4-Dichlorobenzene	NA	-	-	-	-	-	-	-	-	-
3,3'-Dichlorobenzidine	NA	-	-	-	-	-	-	-	-	-
Diethyl Phthalate	NA	-	-	-	-	-	-	-	-	-
Dimethyl Phthalate	NA	-	-	-	-	-	-	-	-	-
Di-n-Butyl Phthalate	NA	-	-	-	-	-	-	-	-	-
2,4-Dinitrotoluene	NA	-	-	-	-	-	-	-	12000	-
2,6-Dinitrotoluene	NA	-	-	-	-	-	-	-	-	-
Di-n-Octyl Phthalate	NA	-	-	-	-	-	-	-	-	-
Fluoranthene	NA	-	-	-	-	-	-	-	-	-
Fluorene	NA	-	-	-	230	4400	-	-	-	-
Hexachlorobenzene	NA	-	-	-	-	420	-	-	-	-
Hexachlorobutadiene	NA	-	-	-	-	-	-	-	-	-
Hexachlorocyclopentadiene	NA	-	-	-	-	-	-	-	-	-
Hexachloroethane	NA	-	-	-	-	-	-	-	-	-
Indeno (1,2,3,c,d) Pyrene	NA	-	-	-	-	-	-	-	-	-
Isophorone	NA	-	-	-	-	1500	-	-	-	-
Naphthalene	NA	-	-	-	-	-	-	-	-	-
Nitrobenzene	NA	-	-	-	-	-	-	-	-	-
N-nitroso-di-n-propylamine	NA	-	-	-	-	-	-	-	-	-
N-nitrosodiphenylamine	NA	-	-	-	-	-	-	-	-	-
Phenanthrene	NA	-	-	-	-	-	-	-	-	-
Pyrene	NA	-	-	-	-	2100	-	-	-	-
1,2,4-Trichlorobenzene	NA	-	-	-	-	5200	-	-	-	-
TOTAL A/B/N TIC's	NA	-	7334000	711400	23650	217650	455000	170	112550	11230

VOA = Volatile Organics; ABN = Acid/Base/Neutral Extractable Compounds
PHC = Petroleum Hydrocarbons; TIC = Tentatively Identified Compounds (Library Search)
NA = Not Analyzed; - = Not Detected



LEGEND:

- APPROX. LOCATION OF GROUNDWATER MONITORING WELL RELATIVE GROUNDWATER ELEVATION

(3.13') 3.15' LINE OF EQUAL POTENTIOMETRIC HEAD

GROUNDWATER FLOW DIRECTION

FABRIC LEATHER CORP.
GLEN COVE, NEW YORK

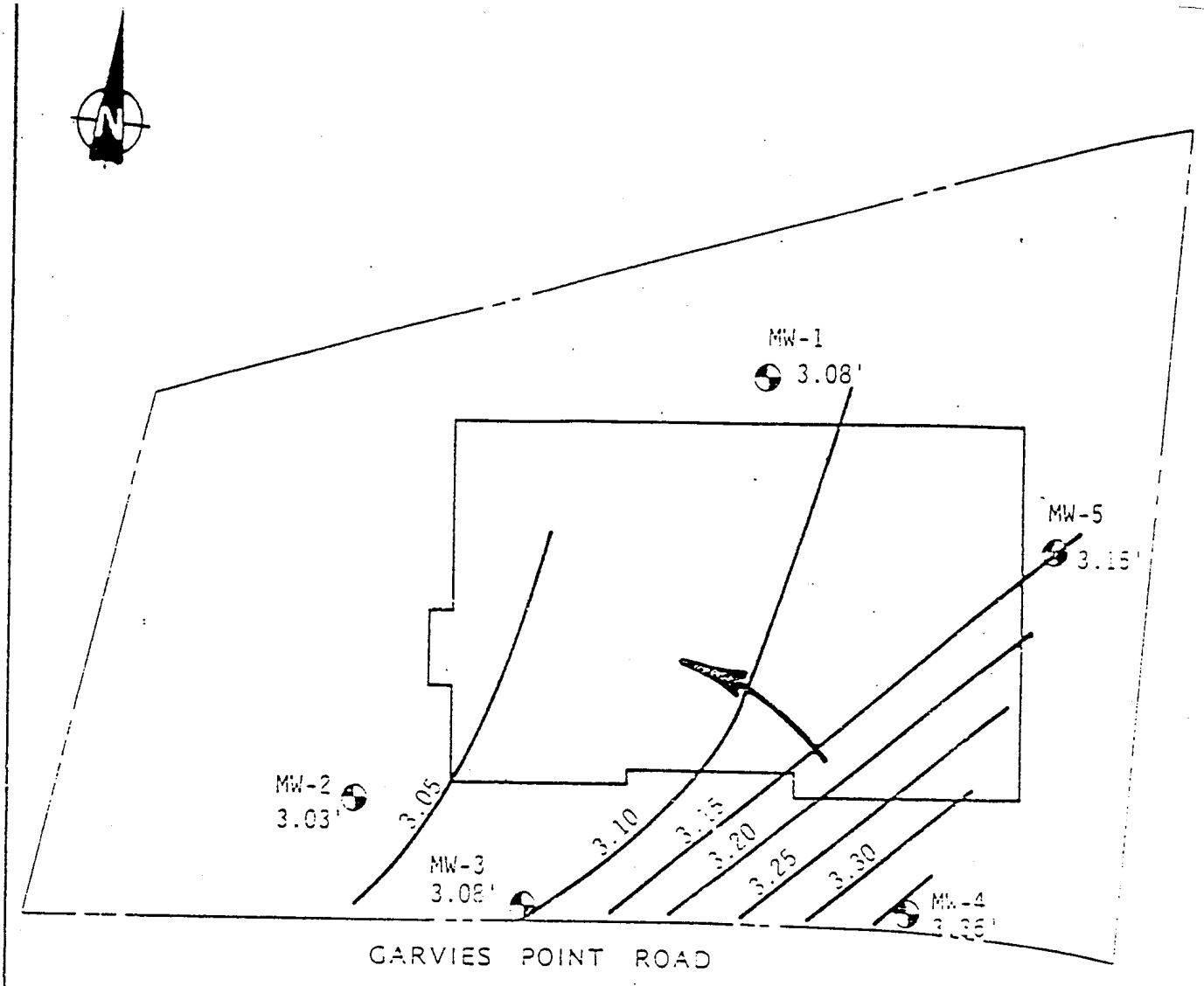
CONCEPTUAL GROUNDWATER CONTOUR MAP

JUNE 9, 1986

CONTOUR INTERVAL = 0.20 FT.

SCALE: 1" = 100'±

Killam



LEGEND:

- APPROX. LOCATION OF GROUNDWATER (3.03') MONITORING WELL W/RELATIVE GROUNDWATER ELEVATION

3.10' LINE OF EQUAL POTENTIOMETRIC HEAD

GROUNDWATER FLOW DIRECTION

FABRIC LEATHER CORP.
GLEN COVE, NEW YORK

CONCEPTUAL GROUNDWATER CONTOUR MAP

JULY 6, 1999

CONTOUR INTERVAL = 0.05 FT.

SCALE: 1" = 100'±

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Killam
Associates Consulting Engineers

MW-1

Lab Sample # : 4888-3

June 30, 1988

LAB ANALYSIS REPORT

Job Name : DLA Lab
Job Number : 000-000-000
Location : 2001
Sample State : Water
Collector : Clt

Customer PO# :
Date Sampled :
Date Received : 06/17/88
Date Completed : 06/27/88
Discard Date : 07/27/88

TEST/PARAMETER	DETECTION LIMIT	RESULT	UN
VOLATILE ORGANICS BY EPA 624			
Benzene	< 2	N.D.	ug/l
Bromoform	< 2	N.D.	ug/l
Carbon Tetrachloride	< 2	N.D.	ug/l
Chlorobenzene	< 2	N.D.	ug/l
Chlorodibromomethane	< 2	N.D.	ug/l
Chloroethane	< 2	N.D.	ug/l
2-Chloroethylvinyl Ether	< 10	N.D.	ug/l
Chloroform	< 2	N.D.	ug/l
Dichlorobromomethane	< 2	N.D.	ug/l
1,1-Dichloroethane	< 2	N.D.	ug/l
1,2-Dichloroethane	< 2	8.8	ug/l
		N.D.	ug/l

**** Continued ****

Comment: A NBS library search was performed on this sample. No compounds were ident:

Killam
Associates - Consulting Engineers

MW-1

Lab Sample # : 4898-3
June 30, 1988

TEST/PARAMETER	DETECTION LIMIT	RESULT	
1,1-Dichloroethylene	< 2	16	ug/l
1,2-Dichloropropane	< 2	N.D.	ug/l
1,3-Dichloropropene	< 2	N.D.	ug/l
Ethylbenzene	< 2	N.D.	ug/l
Methyl Bromide	< 5	N.D.	ug/l
Methyl Chloride	< 5	N.D.	ug/l
Methylene Chloride	< 2	5.3	ug/l
1,1,2,2-Tetrachloroethane	< 2	N.D.	ug/l
Tetrachloroethylene	< 2	N.D.	ug/l
Toluene	< 2	N.D.	ug/l
trans-1,2-Dichloroethylene	< 2	N.D.	ug/l
1,1,1-Trichloroethane	< 2	1200	ug/l
1,1,2-Trichloroethane	< 2	N.D.	ug/l
Trichloroethylene	< 2	N.D.	ug/l
Vinyl Chloride	< 5	N.D.	ug/l
PESTICIDES/PCB's			
Aldrin	< 0.1	N.D.	ug/l
alpha-BHC	< 0.1	N.D.	ug/l
beta-BHC	< 0.1	N.D.	ug/l
gamma-BHC (Lindane)	< 0.1	N.D.	ug/l
delta-BHC	< 0.1	N.D.	ug/l
Chlordane	< 0.5	N.D.	ug/l
4,4'-DDT	< 0.1	N.D.	ug/l
4,4'-DDE	< 0.1	N.D.	ug/l
4,4'-DDD	< 0.1	N.D.	ug/l
Dieldrin	< 0.1	N.D.	ug/l
alpha-Endosulfan	< 0.1	N.D.	ug/l

**** Continued ****

Killam
Associates • Consulting Engineers

MW-5

Lab Sample # : 4888-7

June 30, 1988

LAB ANALYSIS REPORT

Job Name	: DLA Lab	Customer PO#	:
Job Number	: 000-000-000	Date Sampled	:
Location	: 2005	Date Received	: 06/17/88
Sample State	: Water	Date Completed	: 06/27/88
Collector	: Clt	Discard Date	: 07/27/88

TEST/PARAMETER	DETECTION LIMIT	RESULT	U
VOLATILE ORGANICS BY EPA 624			
Benzene	< 2	N.D.	ug/l
Bromoform	< 2	N.D.	ug/l
Carbon Tetrachloride	< 2	N.D.	ug/l
Chlorobenzene	< 2	N.D.	ug/l
Chlorodibromomethane	< 2	N.D.	ug/
Chloroethane	< 2	N.D.	ug/
2-Chloroethylvinyl Ether	< 10	N.D.	ug/
Chloroform	< 2	N.D.	ug/
Dichlorobromomethane	< 2	N.D.	ug/
1,1-Dichloroethane	< 2	N.D.	ug/
1,2-Dichloroethane	< 2	N.D.	ug/

**** Continued ****

Comment: A NBS library search was performed on this sample. No compounds were ide

D.E. Killam
Associates - Consulting Engineers

MW-5

Lab Sample # : 4888-7
June 30, 1988

TEST/PARAMETER	DETECTION LIMIT	RESULT	UNIT
1,1-Dichloroethylene	< 2	N.D.	ug/l
1,2-Dichloropropane	< 2	N.D.	ug/l
1,3-Dichloropropene	< 2	N.D.	ug/l
Ethylbenzene	< 2	N.D.	ug/l
Methyl Bromide	< 5	N.D.	ug/l
Methyl Chloride	< 5	N.D.	ug/l
Methylene Chloride	< 2	N.D.	ug/l
1,1,2,2-Tetrachloroethane	< 2	N.D.	ug/l
Tetrachloroethylene	< 2	170	ug/l
Toluene	< 2	N.D.	ug/l
trans-1,2-Dichloroethylene	< 2	N.D.	ug/l
1,1,1-Trichloroethane	< 2	N.D.	ug/l
1,1,2-Trichloroethane	< 2	N.D.	ug/l
Trichloroethylene	< 2	22	ug/l
Vinyl Chloride	< 5	N.D.	ug/l
cis-1,2-Dichloroethylene	< 1	7.2	ug/l
PESTICIDES/PCB's			
Aldrin	< 0.1	N.D.	ug/l
alpha-BHC	< 0.1	N.D.	ug/l
beta-BHC	< 0.1	N.D.	ug/l
gamma-BHC (Lindane)	< 0.1	N.D.	ug/l
delta-BHC	< 0.1	N.D.	ug/l
Chlordane	< 0.5	N.D.	ug/l
4,4'-DDT	< 0.1	N.D.	ug/l
4,4'-DDE	< 0.1	N.D.	ug/l
4,4'-DDD	< 0.1	N.D.	ug/l
Dieldrin	< 0.1	N.D.	ug/l

**** Continued ****

APPENDIX C

COMPLETED PRELIMINARY CHARACTERIZATION FORMS

PRELIMINARY RCRA FACILTY ASSESSMENT

PRELIMINARY REVIEW CHECKLIST

WORK ASSIGNMENT NO. R02040

FACILITY: FABRIC LEATHER CORPORATION
40 GARVIES POINT ROAD
GLEN COVE, NEW YORK 11542

EPA ID #: _____

FACILITY CONTACT: MR. STEPHEN J. MICHALOWSKI
(516) 671-8220

KEY

P	PROVIDED
NP	NOT PROVIDED
A	ACCEPTABLE
NA	NOT ACCEPTABLE
Y	YES
N	NO
OR	OBSERVED RELEASE (DIRECT EVIDENCE)
SR	SUSPECTED RELEASE (INDIRECT EVIDENCE)
PoR	POTENTIAL RELEASE (POSSIBLE FOR A RELEASE TO OCCUR)
NR	NO RELEASE HAS OCCURRED (DIRECT EVIDENCE)
SWMU	SOLID WASTE MANAGEMENT UNIT
AOC	AREA OF CONCERN

RFA COMPONENT 1: PRELIMINARY REVIEW (PR)

A. General Manufacturing process description: ✓P ___NP ✓A ___NA

Comments: MANUFACTURE OF EXPANDED VINYL BY MIXING PVC RESIN WITH SOLVENTS.

B. General Facility waste generation description: ✓P ___NP ✓A ___NA

Comments: ROLLER WASHING + FORMERLY FROM AN ELECTROSTATIC PRECIPITATOR STORED IN DRUMS < 90 DAYS

C. Environmental/hydrogeologic setting description: ___P ✓NP ___A ✓NA

Comments: NO INFO

D. SWMU identification list: ✓P ___NP ✓A ___NA

Comments: CAPT LOIS REPORT + CLOSURE PLAN

E. Was the SWMU subset of RCRA regulated units denoted? ___Y ___N ___A ___NA

Comments: N/A

F. Were other AOC's (e.g. spills, leaks) listed? ✓Y ___N ___A ✓NA

Comments: 7 ADDITIONAL UST'S (RAW CHEMICALS, MOST LIKELY) SEEN ON NYSDEC 10-4-88 MEMO FIGURE. FACILITY LOCATED ON TOP OF FORMER DUMP.

G. Were potential off-site exposure pathways identified? (e.g. drinking water wells, irrigated farmland, swamps) ___Y ✓N ___A ✓NA

Comments:

H. Detailed SWMU or AOC information:

SWMU # _____ or AOC #1 FORMER 10,000 & 20,000 GALLON HAZ WASTE USTs

1. Is the unit located on a facility map? ✓Y ___N ✓A ___NA

Comments: _____

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ✓N ___A ✓NA

Comments: No age, construction

3. Waste characteristics (e.g. types, volumes, classification):
___Y ✓N ___A ✓NA

Comments: GENERAL STATEMENT THAT THEY PREVIOUSLY CONTAINED "SOLVENTS" & "BLENDED PETROLEUM PRODUCTS" FOR HEATING.

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: Unknown

b. Soil: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ✓N ✓N/A

Comments: NO CLOSURE SOIL SAMPLES COLLECTED. TANKS PASSED A HYDROSTATIC TEST.

c. Ground water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: SEE ABOVE

d. Surface water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ✓N ___ N/A

Comments: TANKS PASSED HYDROSTATIC TEST IN 1986.

e. Subsurface gas: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓ N/A

Comments: SEE ABOVE

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommend no further action.

✓ Recommend a SITE sampling visit.

i. Was sampling performed as part of this RFA? ___Y ___N

ii. Will the sampling be conducted in a RFI? ___Y ___N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:

b. Is the recommendation acceptable? ___Y ___N

Comments:

H. Detailed SWMU or AOC information:

SWMU # _____ or AOC #2 UNDERGROUND STORAGE TANKS

1. Is the unit located on a facility map? ✓Y ___N ✓A ___NA

Comments: NYSDEC 10/4/88 MEMO WITH KILLAM ASSOC. DATA

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ✓N ___A ✓NA

Comments: NO INFO - PRESUMED TO BE RAW MATERIALS/SOLVENTS

3. Waste characteristics (e.g. types, volumes, classification):
___Y ✓N ___A ✓NA

Comments: NO INFO EXCEPT SIZES 3 - 5,000 Gallon 1 - 2,500 gallon 3- 1,500 gallon

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: Unknown

b. Soil: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: TPH 12,000 PPM LEAD 19.9 PPM ANTIMONY 54 PPM
TOTAL VOA TIC = 225,300 PPB

c. Ground water: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: 170 PPB Tetrachloroethylene 72 PPB TCE AT MW-5

d. Surface water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: Unknow

e. Subsurface gas: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: BASED ON SOIL CONTAMINATION

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommend no further action.

✓ Recommend a VSI sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in a RFI? __Y __N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:

b. Is the recommendation acceptable? ✓Y ___N

Comments:

H. Detailed SWMU or AOC information:

SWMU # _____ or AOC #3 DRUM STORAGE AREA

1. Is the unit located on a facility map? ✓Y ___N ✓A ___NA

Comments: CAPT LOIS REPORT

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ✓N ___A ✓NA

Comments: 55 GALLON DRUMS

3. Waste characteristics (e.g. types, volumes, classification):
✓Y ___N ✓A ___NA

Comments: F002 F003 F005 APPROX 15 DRUMS/MONTH

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments:

b. Soil: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments:

c. Ground water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments:

d. Surface water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments:_____

e. Subsurface gas: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments:_____

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommend no further action.

✓ Recommend a VSI sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in a RFI? __Y __N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:_____

b. Is the recommendation acceptable? ___Y ___N

Comments:_____

H. Detailed SWMU or AOC information:

SWMU # _____ or AOC #4 INCINERATOR

1. Is the unit located on a facility map? ___Y ✓N ___A ✓NA

Comments: _____

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ✓N ___A ✓NA

Comments: _____

3. Waste characteristics (e.g. types, volumes, classification):
___Y ___N ___A ___NA

Comments: BURNS EXHAUSTS FROM MACHINES - AIR PERMIT # 280500 3694

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: Unknown

b. Soil: ✓OR ___SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: TPH 190-12,000 PPM 43-45 PPM ANTIMONY
279 PPM ZINC
7500-279,000 PPB DEHP

c. Ground water: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: BASED ON SOIL CONTAMINATION. GW FLOW NOT TOWARDS ANY OF EXISTING WELLS.
1200 PPB trans- 1,2 DCE

d. Surface water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: UNKNOWN

e. Subsurface gas: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: BASED ON SOIL CONTAMINATION

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommend no further action.

✓ Recommend a VSI sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in a RFI? __Y __N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:

b. Is the recommendation acceptable? ✓Y ___N

Comments:

H. Detailed SWMU or AOC information:

SWMU # _____ or AOC #5 WASTE WATER TREATMENT

1. Is the unit located on a facility map? ___Y ✓N ___A ✓NA

Comments: _____

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ✓N ___A ✓NA

Comments: NON-CONTACT COOLING WATER

3. Waste characteristics (e.g. types, volumes, classification):
___Y ✓N ___A ✓NA

Comments: SPDES PERMIT # NY0140546 NOT PRESENT

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: UNKNOWN

b. Soil: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: UNKNOWN

c. Ground water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ___Y ✓N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓N/A

Comments: UNKNOWN

d. Surface water: ___OR ___SR ✓ PoR ___NR

i. Is documentation provided? ___Y ✓ N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓ N/A

Comments: UNKNOWN

e. Subsurface gas: ___OR ___SR ✓ PoR ___NR

i. Is documentation provided? ___Y ✓ N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N ✓ N/A

Comments: UNKNOWN

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

___ Recommend no further action.

✓ Recommend a VSI ~~sampling~~ visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in a RFI? __Y __N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:

b. Is the recommendation acceptable? ___Y ___N

Comments:

I. Did the PR identify any data gaps? ✓Y ___N ___A ___NA

a. If "Y", list the data gaps: NO CLOSURE-RELATED ANALYTICAL DATA PRESENT. 1988 FILE INFO INFERS THAT AN INVESTIGATION OF SOIL/GW IS ONGOING. NO DATA PRESENTED. NO SPDES OR AIR PERMIT INFO FOUND, ALTHOUGH FACILITY HAS CURRENT PERMITS.

Comments: _____

J. Other comments on the PR: _____

RFA Component 2: Visual Site Inspection (VSI)

A. General description of VSI activities: __P X NP __A __NA

Comments: A DRIVE-BY VISUAL SITE INSPECTION ONLY WAS CONDUCTED

B. Site safety plan including the monioring of vapor emissions (respirators, chemically resistant clothing, etc.): __P __NP __A X NA

Comments: _____

C. Facility inspection:

1. Was each SWMU noted in the PR examined? __Y X N

Comments: _____

2. Was each AOC noted in the PR examined? __Y X N

Comments: _____

3. Was the entire facility traversed in order to identify additional AOCs identify additinal SWMUs, complete data gaps from the PR, etc.? __Y __N __A __NA

Comments: _____

a. Were additional SWMUs and/or AOCs noted ? __Y __N

Comments: _____

4. Did the VSI include an inspection beyond the facility boundary? __Y __

Comments: _____

5. SWMU # ___ or AOC NA - DRIVE-BY ONLY

a. Documentation of field observations in logbook: __P __NP __A __NA

i. Visual evidence of unit characteristics (integrity, location): __P __NP __A __NA

Comments: _____

ii. Visual evidence of waste characteristics (e.g. labels): ___ P ___ NP ___ Not applicable

Comments: _____

iii. Visual evidence of pollutant migration pathways (e.g. erosion, run-off): __P __NP

Comments: _____

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): __P __NP __Not applicable

Comments: _____

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): __P __NP __Not applicable

Comments: _____

b. Documentation of SWMU / AOC characteristics and potential migration pathways by photography? __Y __N

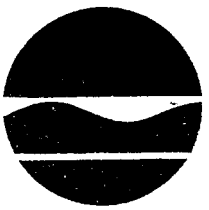
Comments: _____

6. Were the results of the VSI integrated with the PR to provide consistency, to complete any data gaps, and to provide the best recommendations? __Y XN

Comments: DRIVE-BY ONLY

D. Other comments on the VSI:

New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Hazardous Waste Facilities
50 Wolf Road, Albany, New York, 12233-7252
(518) 457-9255 Fax (518) 457-9240



John Cahill
Commissioner

January 14, 1998

Mr. Gerald N. Starkey
Environmental Project Mgr.
Real Estate, Health, Safety & Environment
Borden Chemical, Inc.
180 East Broad Street
Columbus, Ohio 43215-3799

Dear Mr.Starkey:

Re: Borden - Fabric Leather Corp, Glen Cove, NY
EPA Identification Number NYD008918450
RCRA Facility Assessment - VSI Notification Letter

Your facility treated, stored, or disposed of hazardous waste and accordingly sought a permit under the Resource Conservation and Recovery Act of 1976 (RCRA). Pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA), such a facility is subject to RCRA Corrective Action. Therefore, as a first step in the corrective action process, a RCRA Facility Assessment (RFA) is required to determine whether releases of hazardous waste and/or hazardous constituents occurred or are occurring from your facility. The assessment will determine if any such releases exist and if so, whether they require further investigation and the implementation of corrective measures.

Department personnel reviewed the information file on your facility that is located in the Albany Office. The review included examination of a RFA-Preliminary Review which summarizes the findings of the various assessment activities and recommendations for further action or no further action at Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). The available file material was used to identify your facility's SWMUs and AOCs.

A Solid Waste Management Unit is defined as any discernible unit at which solid wastes have been placed at any time irrespective of whether the unit was intended for the management of hazardous or solid wastes. Such units include any area at the facility at which solid wastes have been routinely and systematically released. Sewer systems, including sewer lines, drains, man-holes, sumps, and dry-wells transporting or storing contaminated wastewater, including contaminated storm water, are considered SWMUs by RCRA. However, RCRA corrective action will only be concerned with investigating releases of hazardous waste and/or hazardous constituents from such units.

For the purpose of this assessment and to facilitate delineation of other releases from the facility, the Area of Concern is defined as an area at the facility, or an off-site area, which is not at this time known to be a SWMU, where hazardous waste and/or hazardous constituents are present, or are suspected to be present, as a result of a release from the facility. The term shall include areas of potential or suspected contamination as well as actual contamination.

The next step in the RFA process is a Visual Site Inspection (VSI) of your facility to verify locations of all SWMUs and AOCs, to determine their condition by visual observation, and to resolve any information gaps identified during the file review. In order to conduct the VSI as efficiently as possible, the current status of all SWMUs and AOCs must be known. Therefore, a copy of the RFA-Preliminary Review is enclosed for review by facility personnel knowledgeable in the environmental status of the plant site. In addition, a copy of a SWMU Questionnaire is included for completion. After reading the RFA-Preliminary Review, please fill out the questionnaire to correct any errors, to provide additional information on a SWMU/AOC, or to include information on SWMUs/AOCs not discussed in the RFA-Preliminary Review. The facility must identify both active and inactive sewer systems conveying hazardous waste and/or hazardous constituents, including pipelines with discharges currently subject to SPDES regulation and pipelines with discharges that were not subject to SPDES regulation in the past. Identify the surface water body into which wastewater or storm water discharged. Please return the completed questionnaire, along with the name of the designated facility contact person and their telephone number, within thirty (30) calendar days of the date of this letter to:

Henry Wilkie
Environmental Engineer I
NYSDEC
Division of Solid & Hazardous Materials
Bureau of Hazardous Waste Facilities
50 Wolf Road, Albany, New York, 12233-7252

After receipt and review of the completed questionnaire, Department personnel will contact the designated individual to schedule our inspection. The VSI will require the assistance of some of your personnel in reviewing current and past solid waste management practices during the inspection. We are requesting permission to take photographs of the SWMUs and AOCs to document the condition of the units and the areas.

Should you have any questions regarding the contents of this letter, please contact me at (518) 457-9255. I would like to thank you for your anticipated assistance in this matter.

Sincerely,

Henry Wilkie
Environmental Engineer I
Bureau of Hazardous
Waste Facilities
Division of Solid & Hazardous
Material

cc: [redacted], EPA Region II
Anthony Cava, DEC Region 1

Jock.

New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Hazardous Waste Facilities
50 Wolf Road, Albany, New York, 12233-7252
(518) 457-9255 Fax (518) 457-9240

John Cahill
Commissioner

December 20, 1997

C. R. Springer
Director, Environmental Affair
Borden Chemical
1105 Schrock Road
Suite 401
Columbus, Ohio 43229

R-1

Dear Mr.Springer:

Re: Borden - Fabric Leather Corp, Glen Cove, NY
EPA Identification Number NYD008918450
RCRA Facility Assessment - VSI Notification Letter

Your facility treated, stored, or disposed of hazardous waste and accordingly sought a permit under the Resource Conservation and Recovery Act of 1976 (RCRA). Pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA), such a facility is subject to RCRA Corrective Action. Therefore, as a first step in the corrective action process, a RCRA Facility Assessment (RFA) is required to determine whether releases of hazardous waste and/or hazardous constituents occurred or are occurring from your facility. The assessment will determine if any such releases exist and if so, whether they require further investigation and the implementation of corrective measures.

Department personnel reviewed the information file on your facility that is located in the Albany Office. The review included examination of a RFA-Preliminary Review which summarizes the findings of the various assessment activities and recommendations for further action or no further action at Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). The available file material was used to identify your facility's SWMUs and AOCs.

A Solid Waste Management Unit is defined as any discernible unit at which solid wastes have been placed at any time irrespective of whether the unit was intended for the management of hazardous or solid wastes. Such units include any area at the facility at which solid wastes have been routinely and systematically released. Sewer systems, including sewer lines, drains, man-holes, sumps, and dry-wells transporting or storing contaminated wastewater, including contaminated storm water, are considered SWMUs by RCRA. However, RCRA corrective action will only be concerned with investigating releases of hazardous waste and/or hazardous constituents from such units.

For the purpose of this assessment and to facilitate delineation of other releases from the facility, the Area of Concern is defined as an area at the facility, or an off-site area, which is not at this time known to be a SWMU, where hazardous waste and/or hazardous constituents are present, or are suspected to be present, as a result of a release from the facility. The term shall include areas of potential or suspected contamination as well as actual contamination.

The next step in the RFA process is a Visual Site Inspection (VSI) of your facility to verify locations of all SWMUs and AOCs, to determine their condition by visual observation, and to resolve any information gaps identified during the file review. In order to conduct the VSI as efficiently as possible, the current status of all SWMUs and AOCs must be known. Therefore, a copy of the RFA-Preliminary Review is enclosed for review by facility personnel knowledgeable in the environmental status of the plant site. In addition, a copy of a SWMU Questionnaire is included for completion. After reading the RFA-Preliminary Review, please fill out the questionnaire to correct any errors, to provide additional information on a SWMU/AOC, or to include information on SWMUs/AOCs not discussed in the RFA-Preliminary Review. The facility must identify both active and inactive sewer systems conveying hazardous waste and/or hazardous constituents, including pipelines with discharges currently subject to SPDES regulation and pipelines with discharges that were not subject to SPDES regulation in the past. Identify the surface water body into which wastewater or storm water discharged. Please return the completed questionnaire, along with the name of the designated facility contact person and their telephone number, within thirty (30) calendar days of the date of this letter to:

Henry Wilkie
Environmental Engineer I
NYSDEC
Division of Solid & Hazardous Materials
Bureau of Hazardous Waste Facilities
50 Wolf Road, Albany, New York, 12233-7252

After receipt and review of the completed questionnaire, Department personnel will contact the designated individual to schedule our inspection. The VSI will require the assistance of some of your personnel in reviewing current and past solid waste management practices during the inspection. We are requesting permission to take photographs of the SWMUs and AOCs to document the condition of the units and the areas.

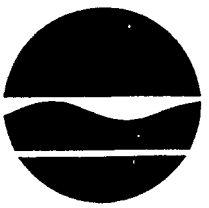
Should you have any questions regarding the contents of this letter, please contact me at (518) 457-9255. I would like to thank you for your anticipated assistance in this matter.

Sincerely,

Henry Wilkie
Environmental Engineer I
Bureau of Hazardous
Waste Facilities
Division of Solid & Hazardous
Material

cc: J. Reidy, EPA Region II
Anthony Cava, DEC Region 1

New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Hazardous Waste Facilities
50 Wolf Road, Albany, New York, 12233-7252
(518) 457-9255 Fax (518) 457-9240



John Cahill
Acting Commissioner

Mr. Goodger
Fabric Leather Corp
40 Garvies Point Road
Glenn Cove, NY 11794

JUN 2 3 1997

R-1

Dear Mr. Goodger:

Re: Fabric Leather Corp
EPA Identification Number NYD008918450
RCRA Facility Assessment - VSI Notification Letter

Your facility treated, stored, or disposed of hazardous waste and accordingly sought a permit under the Resource Conservation and Recovery Act of 1976 (RCRA). Pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA), such a facility is subject to RCRA Corrective Action. Therefore, as a first step in the corrective action process, a RCRA Facility Assessment (RFA) is required to determine whether releases of hazardous waste and/or hazardous constituents occurred or are occurring from your facility. The assessment will determine if any such releases exist and if so, whether they require further investigation and the implementation of corrective measures.

Department personnel reviewed the information file on your facility that is located in the Albany Office. The review included examination of a RFA-Preliminary Review which summarizes the findings of the various assessment activities and recommendations for further action or no further action at Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). The available file material was used to identify your facility's SWMUs and AOCs.

A Solid Waste Management Unit is defined as any discernible unit at which solid wastes have been placed at any time irrespective of whether the unit was intended for the management of hazardous or solid wastes. Such units include any area at the facility at which solid wastes have been routinely and systematically released. Sewer systems, including sewer lines, drains, man-holes, sumps, and dry-wells transporting or storing contaminated wastewater, including contaminated storm water, are considered SWMUs by RCRA. However, RCRA corrective action will only be concerned with investigating releases of hazardous waste

and/or hazardous constituents from such units.

For the purpose of this assessment and to facilitate delineation of other releases from the facility, the Area of Concern is defined as an area at the facility, or an off-site area, which is not at this time known to be a SWMU, where hazardous waste and/or hazardous constituents are present, or are suspected to be present, as a result of a release from the facility. The term shall include areas of potential or suspected contamination as well as actual contamination.

The next step in the RFA process is a Visual Site Inspection (VSI) of your facility to verify locations of all SWMUs and AOCs, to determine their condition by visual observation, and to resolve any information gaps identified during the file review. In order to conduct the VSI as efficiently as possible, the current status of all SWMUs and AOCs must be known. Therefore, a copy of the RFA-Preliminary Review is enclosed for review by facility personnel knowledgeable in the environmental status of the plant site. In addition, a copy of a SWMU Questionnaire is included for completion. After reading the RFA-Preliminary Review, please fill out the questionnaire to correct any errors, to provide additional information on a SWMU/AOC, or to include information on SWMUs/AOCs not discussed in the RFA-Preliminary Review. The facility must identify both active and inactive sewer systems conveying hazardous waste and/or hazardous constituents, including pipelines with discharges currently subject to SPDES regulation and pipelines with discharges that were not subject to SPDES regulation in the past. Identify the surface water body into which wastewater or storm water discharged. Please return the completed questionnaire, along with the name of the designated facility contact person and their telephone number, within thirty (30) calendar days of the date of this letter to:

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Environmental Engineer I
NYSDEC
Division of Solid & Hazardous Materials
Bureau of Hazardous Waste Facilities
50 Wolf Road, Albany, New York, 12233-7252

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Should you have any questions regarding the contents of this letter, please contact me at (518) 457-9255. I would like to thank you for your anticipated assistance in this matter.

Sincerely,

Henry Wilkie
Environmental Engineer I
Bureau of Hazardous
Waste Facilities
Division of Solid & Hazardous
Material

cc: J. Reidy, EPA Region II
Anthony Cava, DEC Region 1

TRC formerly Alliance Technologies Corporation
TRC Environmental Corporation

291 Broadway, Suite 1206
New York, NY 10007
☎ (212) 349-4616
Fax (212) 349-4648

HAND DELIVERY

September 30, 1993

Elizabeth Van Rabenswaay
Regional Project Officer
U.S. Environmental Protection Agency
Air and Waste Management Division
26 Federal Plaza, Room 1006
New York, NY 10278

Reference: Contract No. 68-W9-0003, TES 6
Work Assignment No. R02040
Multi Sites Preliminary RFAs
(Ref. 1-635-393)

Subject: Deliverable - Draft Preliminary RCRA Facility Assessment for Fabric Leather Corporation, EPA ID No. NYD008918450

Dear Liz,

In accordance with the reporting requirements of the subject Work Assignment, a copy of the Draft Preliminary RCRA Facility Assessment Report for the Fabric Leather Corporation facility (EPA ID No. NYD00337584) has been submitted directly to the WAM, John Nevius.

Please note that this report has not undergone TRC's standard QA/QC review. TRC is submitting only a draft copy of the report without appendices at this time. TRC will perform the QA/QC review and submit the full Prelimary RCRA Facility Assessment report to EPA tomorrow, October 1, 1993.

Questions regarding this submission should be directed to the TRC Project Manager, Michael F. Clark, at (508) 970-5600, or me at (212) 349-4616.

Sincerely,

Douglas Sullivan
Regional Manager

DS/es

cc: John Nevius/EPA Work Assignment Manager
David Boyd/TES-6 Contracting Officer (letter only)
Michael F. Clark/TRC Project Manager
TES ZPMO (letter only)

DRAFT

PRELIMINARY RCRA FACILITY ASSESSMENT
FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Air and Waste Management Division
26 Federal Plaza
New York, New York 10278

Work Assignment:	R02040
EPA Region:	II
EPA Site/Facility I.D. No.:	NYD008918450
Contract No.:	68-W9-0003 (TES-6)
TRCC Document No.:	L93-959
TRCC Project No.:	1-636-393-3-2000-0
TRCC Work Assignment Manager:	Edward P. Benz, P.G.
Telephone No.:	(908) 563-1100
Subcontractor No.:	N/A
Subcontractor Project Manager:	N/A
Telephone No.:	N/A
EPA Work Assignment Manager:	John Nevius
Telephone No.:	(212) 264-9578
Date Prepared:	September 29, 1993

TRC COMPANIES, INC.
Boott Mills South
Foot of John Street
Lowell, Massachusetts 01852-1124
(508) 970-5600

TRC

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TABLE OF CONTENTS

TABLES

FIGURES

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1.0 INTRODUCTION

TRC Environmental Corporation (TRC - formerly Alliance Technologies Corporation) was requested by the U.S. Environmental Agency (EPA) under EPA Contract No. 68-W9-0003 (TES-6), Work Assignment No. R02040, to perform a Preliminary RCRA Facility Assessment (RFA) of the Fabric Leather Corporation (Fabric Leather) facility in Glen Cove, New York (EPA I.D. No. NY0008918450). Tasks were performed in accordance with the Preliminary RFA Scope of Work provided by EPA on June 8, 1993, and TRC's Work Plan, dated July 14, 1993.

The purpose of the Preliminary RFA is to identify, gather information on, and evaluate the potential for releases to the environment from areas of concern (AOCs), including solid waste management units (SWMUs) and areas where releases may have occurred in the past. In addition, the Preliminary RFA will provide information for EPA use in the ranking of this facility using the National Corrective Action Prioritization System (NCAPS).

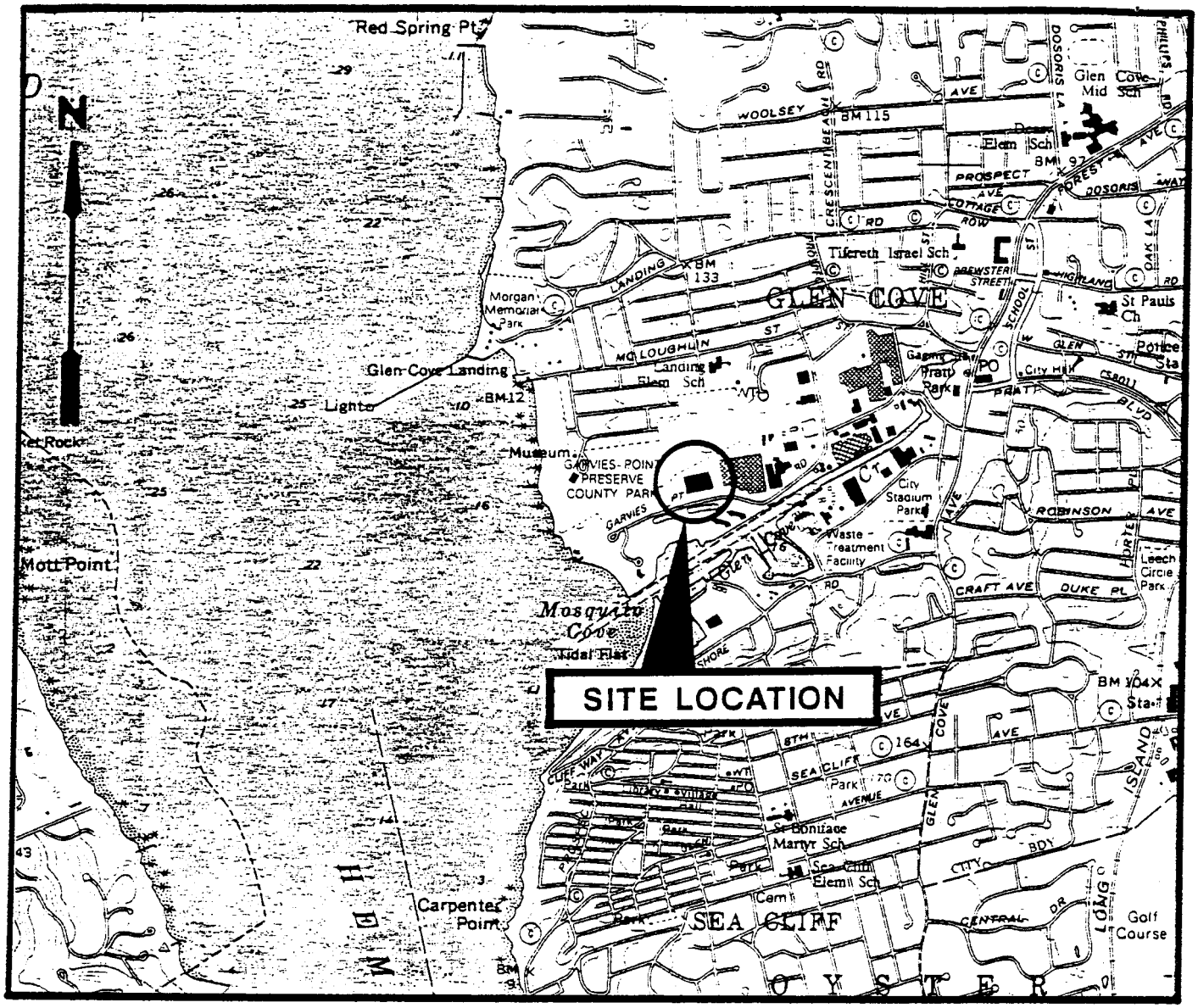
Background information for this Interim Preliminary RFA Report was obtained through file searches conducted at the New York State Department of Environmental Conservation (NYSDEC), Albany, New York, Bureau of Hazardous Waste Facility Compliance, Bureau of Wastewater Facilities Design, and the Bureau of Air Application, Review and Permitting.

A review of EPA files was not conducted, at the request of the Work Assignment Manager (WAM).

2.0 FACILITY DESCRIPTION

The Fabric Leather facility is located at 40 Garvies Point Road in Glen Cove, Suffolk County, New York (Figure 1). The facility consists of a factory/warehouse/office building and a parking lot (Figure 2). Information regarding block and lot number as well as lot size was not available during the preliminary NYSDEC file review. A Visual Site Inspection (VSI) conducted on September 1, 1993 noted "For Lease" signs on the property as well as signs indicating that Fabric Leather is or was a subsidiary of Borden Chemical. No activity was noted on the property at the time of the VSI (TRC, 1993). This VSI was a "drive-by" inspection; TRC personnel did not physically enter the Fabric Leather property.

Fabric Leather began manufacturing expanded vinyl (imitation leather) in 1966. Processes included mixing polyvinyl chloride resin with solvents. The facility was closed in 1988 (NYSDEC, 1988a).



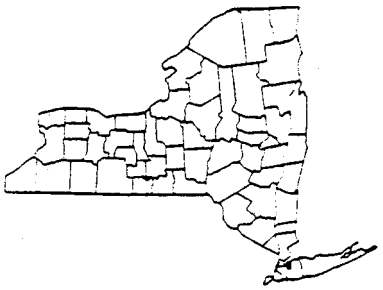
SCALE 1:24000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

1991 magnetic declination is approximately 13.5° West



QUADRANGLE LOCATION

SOURCE: USGS 7.5 MINUTE TOPOGRAPHIC MAP QUADRANGLE, SEA CLIFF, N.Y.

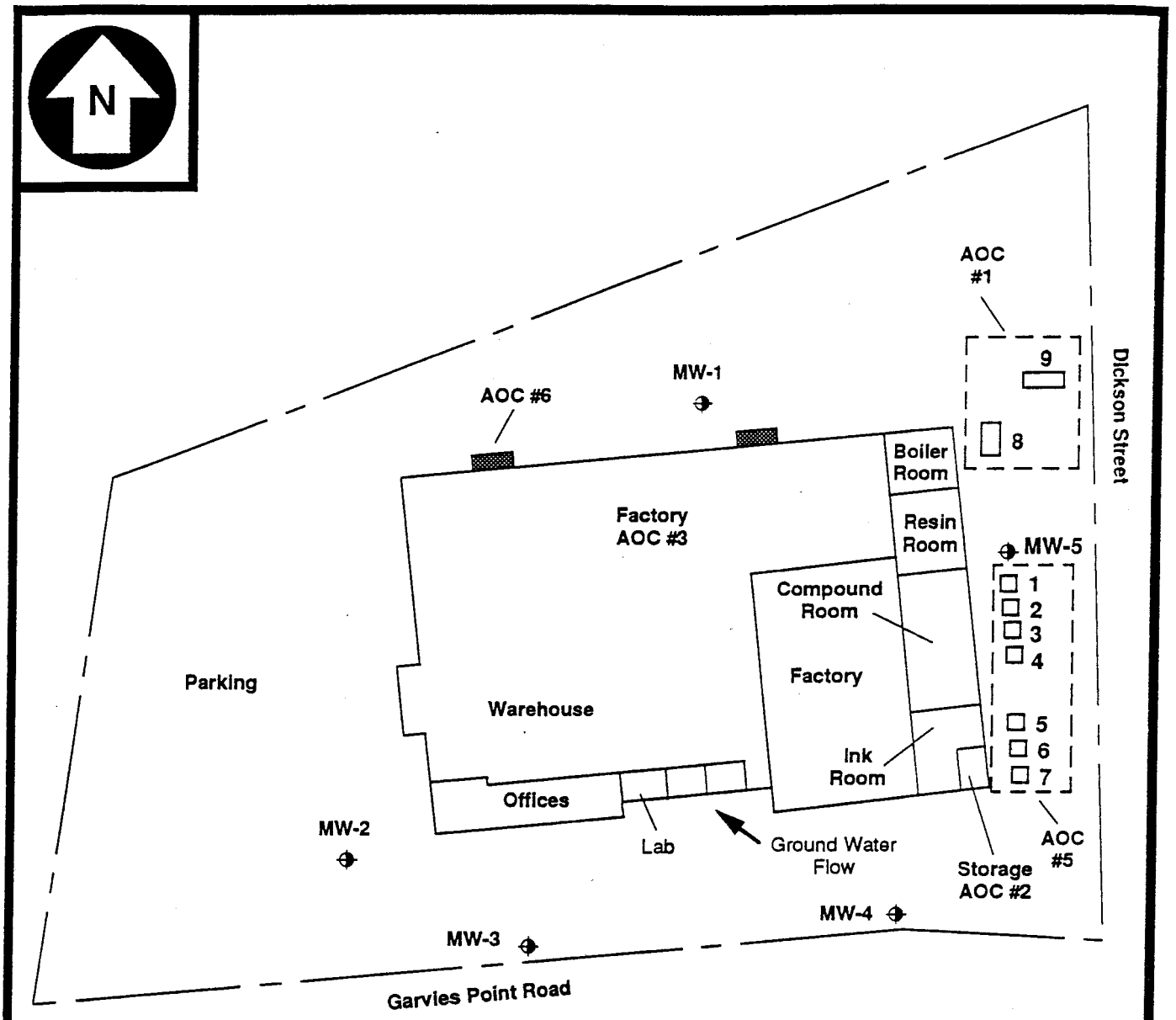
TRC Environmental Corporation
18 Worlds Fair Drive
Somerset, N.J. 08873

FABRIC LEATHER CORPORATION
40 GARVIES POINT ROAD
GLEN COVE, N.Y.

SITE LOCATION MAP

Date: 8-26-93	Proj.# 1-635-393	Fig. 1

WORK ASSIGNMENT NO. R02040



Key	
⊕	Approximate Location of Ground Water Monitoring Well (screened interval unknown)
1-3	5,000 gallon USTs
4	2,500 gallon UST
5-7	1,500 gallon USTs
8	10,000 gallon UST
9	20,000 gallon UST

Compiled From: A.H. Salkowitz, Jamaica, New York and Killam Associates, Consulting Engineers

Not to Scale

FACILITY PLAN

FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK

TRC

Figure 2.

MS73/1

Six Areas of Concern (AOCs) were identified during the preliminary file review. Table 1 outlines the currently known AOCs at Fabric Leather and Figure 2 depicts the approximate location of these AOCs.

AOC #1 is an area east of the facility building consisting of a 20,000 gallon underground storage tank (UST) and a 10,000 gallon UST. These tanks were previously used to store solvents and blended petroleum products which were apparently then incinerated for heating purposes at the facility. However, it is not known whether solvents were blended with the petroleum products, or whether they were stored in a separate tank. Similarly, it is not known if solvents were incinerated for heating, or if only blended petroleum was used. These two tanks were emptied and closed in accordance with 6 NYCRR Part 360 in 1985 (NYSDEC, 1988a).

AOC #2 is an indoor hazardous waste storage area located in the southeast corner of the facility building which was used to store solvents for less than 90 days. Wastes included solvents containing methylene chloride (F003), solvents containing toluene and naptha (F002), and resins contaminated with the above solvents (F005) (NYSDEC, 1988a).

AOC #3 is an incinerator (location unknown) which was used to burn exhaust from machines via an air permit. The incinerator apparently replaced an electrostatic precipitator (NYSDEC, 1988a).

AOC #4 is a discharge (location unknown) for non-contact cooling water (permit # NY0140546) (NYSDEC, 1988a).

AOC #5 consists of an area east of the facility building where three 5,000-gallon USTs, one 2,500-gallon UST and three 1,500-gallon USTs are or were located. No information is available regarding the contents or previous contents of these tanks (NYSDEC, 1988b).

AOC #6 is the ESP/incinerator stained soil area in the vicinity of sample 6 collected by Killam Associates in 1988. This area was found to contain phthalates at concentrations as high as 380,000 milligrams per kilogram. Some soil was excavated and an asphalt seal was installed. The area appears to be associated with a release from the electrostatic precipitator and incinerator.

3.0 FACILITY ACTIVITY/HISTORY

Fabric Leather occupied the facility between 1966 and approximately 1988 (NYSDEC, 1988). The property is reportedly part of an old dump which was active prior to 1966, a portion of which is a Superfund site located approximately 100 yards from the Fabric Leather property. No further information regarding this dump or other previous history of the property was found during the Preliminary Review.

TABLE 1. AREAS OF CONCERN

AOC No.	Description	Start-up/ Closure Dates	Release Status	Reference	Medium/ Compounds Detected	Off-site Migration Potential
1	1 20,000-gallon underground storage tank (UST) 1 10,000-gallon UST East of Facility Bldg.	Unknown/ 1985	Potential release	NYSDEC, 1988a NYSDEC, 1988b	Ground water/ Chlorinated solvents	High - ground water is contaminated
2	Indoor Hazardous Waste Storage Area	1966 (?) 1988	Unknown	NYSDEC, 1988a	N/A	Unknown - No information available
3	Incinerator	Unknown/ 1988	Unknown	NYSDEC, 1988a	N/A	Unknown - No information available
4	Former discharge (location unknown) for non-contact cooling water	Unknown/ 1988	Unknown	NYSDEC, 1988a	N/A	Unknown - No information available
5	3 5,000-gallon UST's 1 2,500-gallon UST 3 1,500-gallon UST's	Unknown/ Unknown	Potential release	NYSDEC, 1988a NYSDEC, 1988b	Ground water/ Chlorinated solvents	High - ground water is contaminated
6	ESP/Incinerator Stained Soil Area	1966/ Unknown	Documented Release	Killam, 1988	Soil/phthalates, metals	Low; source was removed, area was capped.

The facility manufactured expanded vinyl (imitation leather) by mixing polyvinyl chloride resin with solvents. Wastes, including methylene chloride, toluene, naphtha, and contaminated resins, were generated from roller washing operations and from the electrostatic precipitator. In 1988, wastes were stored in drums (NYSDEC, 1988). No further information regarding facility operations or waste streams generated was located by TRC during the Preliminary Review.

In 1985 the two USTs (AOC #1) underwent closure in accordance with 6NYCRR 360.8(c)(6)(v). Each tank was hydrostatically leak tested, triple rinsed, scraped and cleaned. Waste rinse liquids were manifested and removed from the facility (Donnelly, 1985). After closure, these tanks were used to store number two fuel oil for heating the onsite building (Donnelly, 1986).

On March 27, 1986 Fabric Leather submitted a Closure Plan to the New York State Department of Environmental Conservation (NYSDEC). This Closure Plan stated that the facility would close on June 1, 2000 (Borden, 1986a).

On April 2, 1986, NYSDEC informed Fabric Leather that its office had received engineering certification of closure for the Fabric Leather facility and that all applicable regulatory requirements had been met for RCRA-permitted portions of the facility. NYSDEC further stated that Fabric Leather was required to submit a formal request to the EPA to deny their Part B permit in order to terminate the facility's interim status (NYSDEC, 1986). Fabric Leather submitted this request on April 17, 1986 (Borden, 1986b).

On October 6, 1988, NYSDEC notified Fabric Leather that their Interim Status was being retained pending an investigation, which was being performed to evaluate the necessity of corrective action measures required under the Federal Hazardous and Solid Waste Amendments (HSWA) Section 3008(h) (NYSDEC, 1988c).

On October 24, 1988, NYSDEC informed Fabric Leather that the facility was required to undergo full closure (NYSDEC, 1988d). Further information regarding facility closure and shut-down was not found during the Preliminary Review.

On November 11, 1988, Killam Associates, Consulting Engineers completed a site inspection report for Fabric Leather. Five ground water monitoring wells were installed and sampled and six surface soil locations were sampled and analyzed for volatile organic compounds, base-neutral/acid extractables, polychlorinated biphenyls, pesticides and metals. Laboratory data indicates that ground water sampled from MW-1 contained 8.8 micrograms per liter (µg/l) 1,1-dichloroethane, 16 µg/l 1,1-dichloroethylene, 5.3 µg/l methylene chloride, and 1,200 µg/l 1,1,1-trichloroethane. Samples from MW-5 contained 170 µg/l tetrachloroethylene, 22 µg/l trichloroethylene and 7.2 µg/l cis-1,2-dichloroethylene (NYSDEC, 1988b). Soil samples were found to contain metals, including antimony as high as 59 milligrams per kilogram (mg/kg)

(#4); copper as high as 21.5 mg/kg (#6); lead as high as 23 mg/kg (#4), and thallium as high as 22 mg/kg (NYSDEC, 1988b). In addition, base-neutral/acid extractables (BNAs) were detected in soils at concentrations as high as 380,000 micrograms per kilogram (µg/kg) of bis(2-ethylhexyl)phthalate in sample 6, and 120,000 µg/kg of butyl benzene phthalate in sample 6. Analytical data including sampling locations and laboratory analytical results from this event are presented in Appendix A.

Based on the analytical data, Killam recommended that soils from the visibly discolored areas (presumably around samples 2 through 6) be removed (Killam, 1988). In addition to chemical contamination, Killam noted that at least one boiler tank was lined with asbestos containing material (35 percent Amocite asbestos) (Killam, 1988).

According to undated diagrams located in the NYSDEC files reviewed by TRC, soil was excavated in the area of sample 6, which may have been associated with the electrostatic precipitator and the incinerator. The figures are presented in Appendix A.

4.0 ENVIRONMENTAL SETTING

Geologically, Long Island forms the Ronkonkama terminal moraine, which, along the northern shore, consists of sand, gravel, and clay to a depth of approximately 250 feet below ground surface (Hang and Salvo, 1980). The Site Investigation conducted by Killam Associates indicates that ground water flows to the northwest (NYSDEC, 1988b). Ground water in the area is no longer used for drinking water. Two municipal wells located approximately one mile from Fabric Leather were closed due to contamination in the 1970s (TRC, 1993).

5.0 PRELIMINARY EVALUATION

Preliminary information for this interim evaluation was provided in Table 1. Analytical data from Killam's Site Investigation conducted in 1988 indicate that ground water at the Fabric Leather property is contaminated with chlorinated solvents. Soils collected from visibly stained areas were found to contain phthalates at concentrations as high as 380,000 mg/kg. Based on information presented in undated figures, one of these areas was associated with the electrostatic processor and incinerator. The area was partially remediated. No other information regarding remedial activities was located by TRC in the available files.

Limited information was located in the state files. In addition, the VSI consisted only of a drive-by. Due to the lack of information, TRC believes that further sampling and environmental investigations should be conducted at the Fabric Leather property.

6.0 SUMMARY

Fabric Leather Corporation (Fabric Leather) is located at 40 Garvies Point Road in Glen Cove, New York. Fabric Leather manufactured expanded vinyl (imitation leather) at the facility from 1966 to approximately 1988. Processes included mixing polyvinyl chloride resin with solvents.

Six Areas of Concern (AOCs) have been identified at the facility including a 20,000 gallon underground storage tank (UST) and a 10,000 gallon UST. Prior to 1985, these tanks were used to store solvents and blended petroleum products which were apparently then incinerated for heating purposes at the facility. In 1985, the two USTs underwent closure procedures and were then used to store number two fuel oil for heating the facility building. In 1988, a site investigation was conducted by Killam Associates, Consulting Engineers. Four ground water monitoring wells were installed and six soil samples were collected. Analytical data from the event indicates that ground water flows southeast to the northwest and is contaminated with chlorinated solvents. Soils were found to be contaminated with phthalates and metals.

Subsequent to closure of its RCRA-permitted facility operations, Fabric Leather requested that EPA terminate its Interim Status under RCRA. On October 6, 1988, the New York State Department of Environmental Conservation (NYSDEC) notified Fabric Leather that their interim status was being retained pending on investigation to determine the need for corrective action under the Federal Hazardous and Solid Waste Amendments (HSWA).

Based on the available information, releases have occurred from the facility. Sampling previously conducted by Killam Associates is inadequate to fully characterize the extent of contamination.

REFERENCES

Borden, 1986a. Letter to Mrs. A. Ga ra, NYSDEC, RE: Closure Plan for Fabric Leather Corporation. Fabric Leather Corporation, Division of Borden Chemical, Borden, Inc., March 27.

Borden, 1986b. Letter to Mr. Richard A. Baker, Chief, Permits Administration Branch, USEPA - Region II, RE: Request to deny Part B Permit for Fabric Leather Corporation. Borden, Inc., April 17.

Donnelly, 1985. Letter to Mr. John L. Middelkoop, P.E., NYSDEC, regarding UST Closure at Fabric Leather Corporation, Glen Cove, New York. Donnelly Engineering, November 7.

Donnelly, 1986. Letter to Permits Administrator, NYSDEC, Region I, regarding Fabric Leather Corporation, Division of Borden Chemical. Donnelly Engineering, February 19.

Hang and Salvo, 1980. Toxics on Tap; contamination of Long Island's Drinking Water Supplies, 1980.

Killam, 1988. Report for Site Inspection of the Fabric Leather Facility. Conducted by Killam Associates for Fabric Leather. November 11.

NYSDEC, 1986. Letter to Mr. Stephen J. Michalowski, Fabric Leather Corporation, RE: Certification of Closure. New York State Department of Environmental Conservation, April 2.

NYSDEC, 1988a. Capt Lois Site Visit for Fabric Leather Corporation, Glen Cove, NY, NYD008918450. New York State Department of Environmental Conservation, September 30.

NYSDEC, 1988b. Memo regarding Garvies Point Condominiums - Data from Environmental Survey at Fabric Leather. New York State Department of Environmental Conservation, October 4.

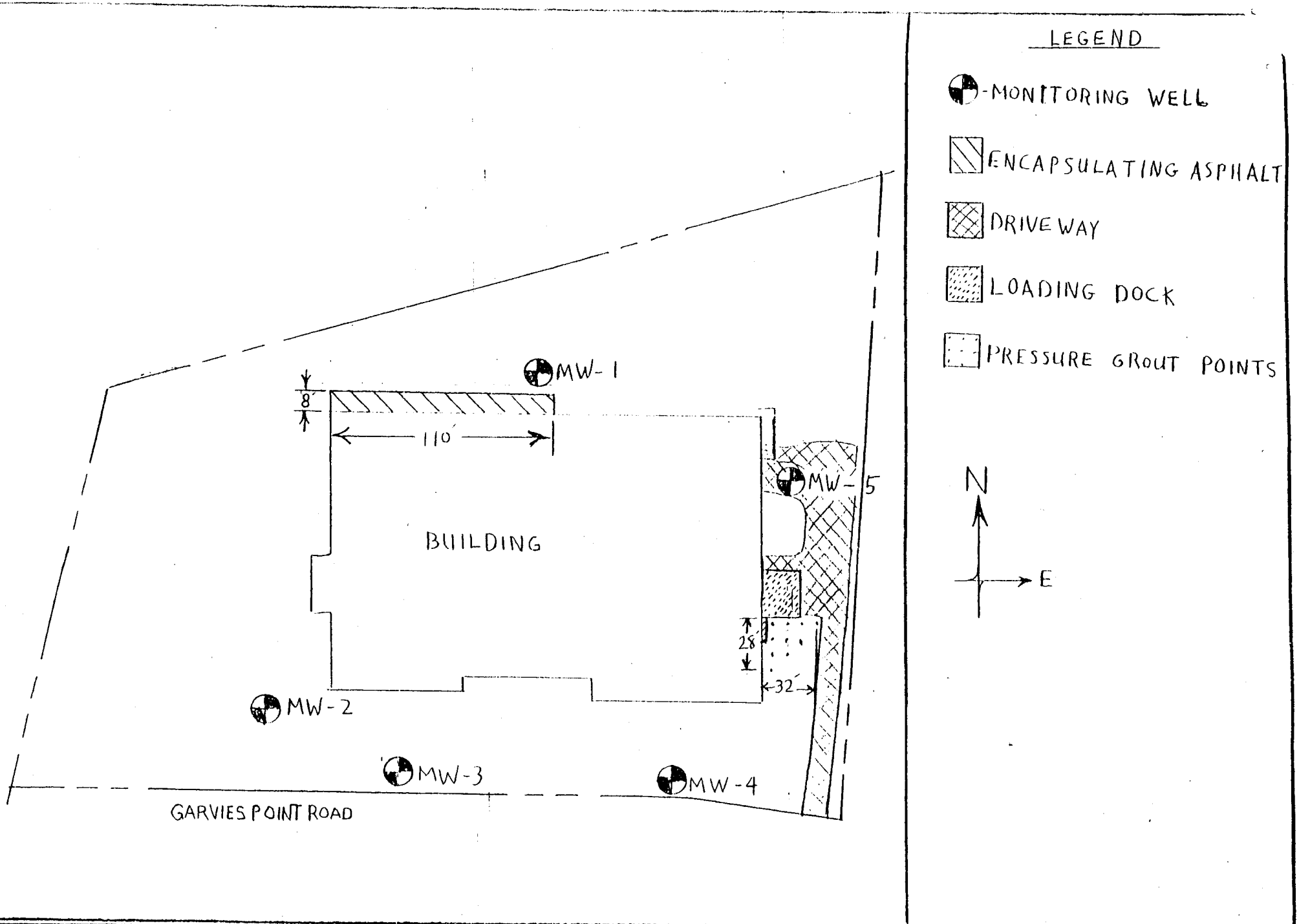
NYSDEC, 1988c. Letter to Mr. Goodger, Fabric Leather Corporation, RE: Retention of Interim Status Classification. New York State Department of Environmental Conservation, October 6.

NYSDEC 1988d. Letter to Mr. Richard Springer, P.E. Borden Company, RE: Full Closure Requirement, Fabric Leather Corporation. New York State Department of Environmental Conservation, October 24.

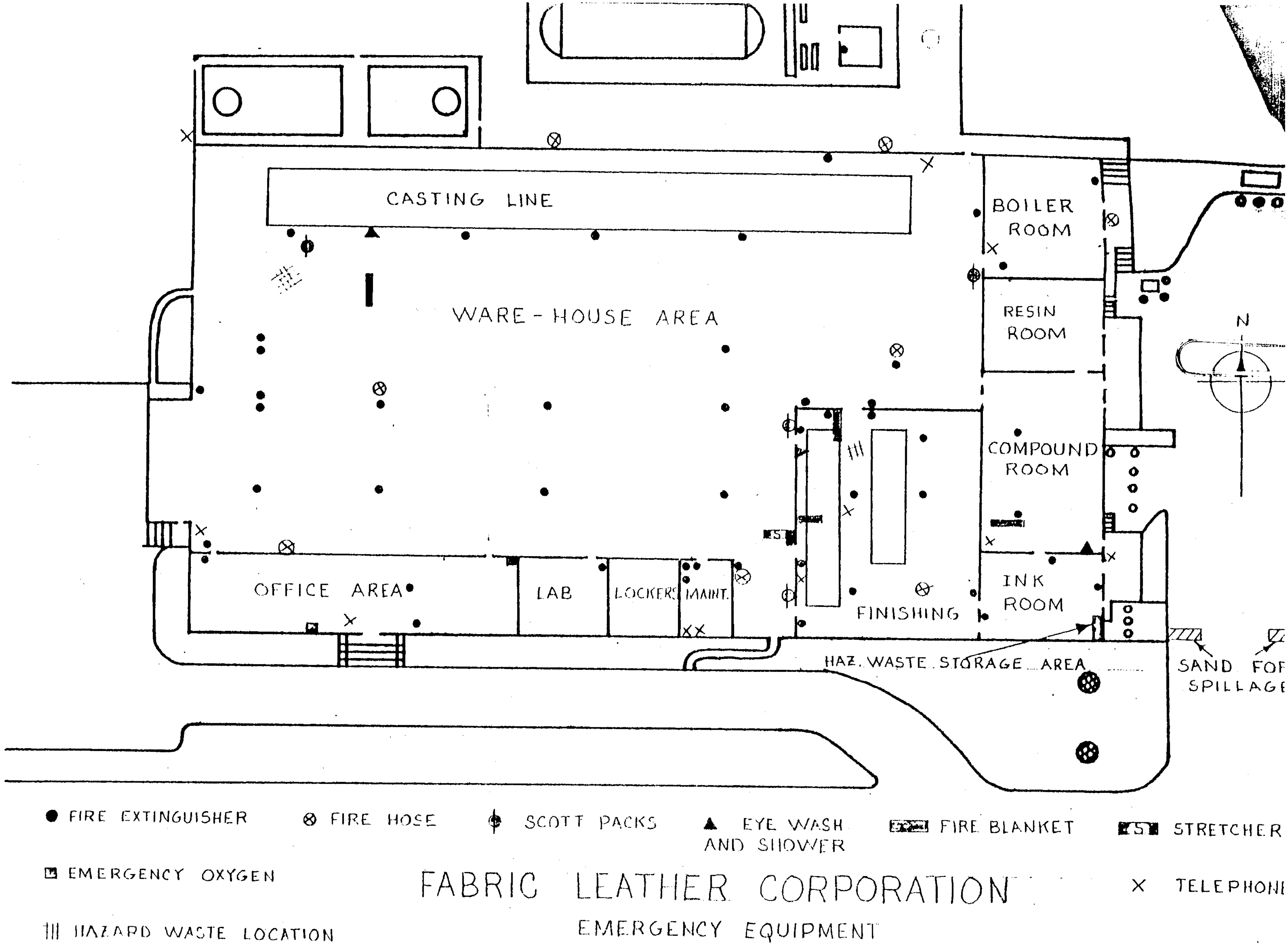
TRC, 1993. Communication between M. Clark, TRC, and M. Martino, Glen Cove Water Superintendent. September 20.

APPENDIX A

FIGURES



SUBJECT: FABRIC LEATHER	SCALE: NOT TO SCALE	DRAWN BY: PETER F. PAUL
BORDEN, INC	DRAWN: 11/25/92	PUBLIC HEALTH SANITARIAN
ADDRESS: 40 GARVIES PT RD	OBSERVED: 10/6/92	FOR: NASSAU COUNTY



FABRIC LEATHER CORPORATION

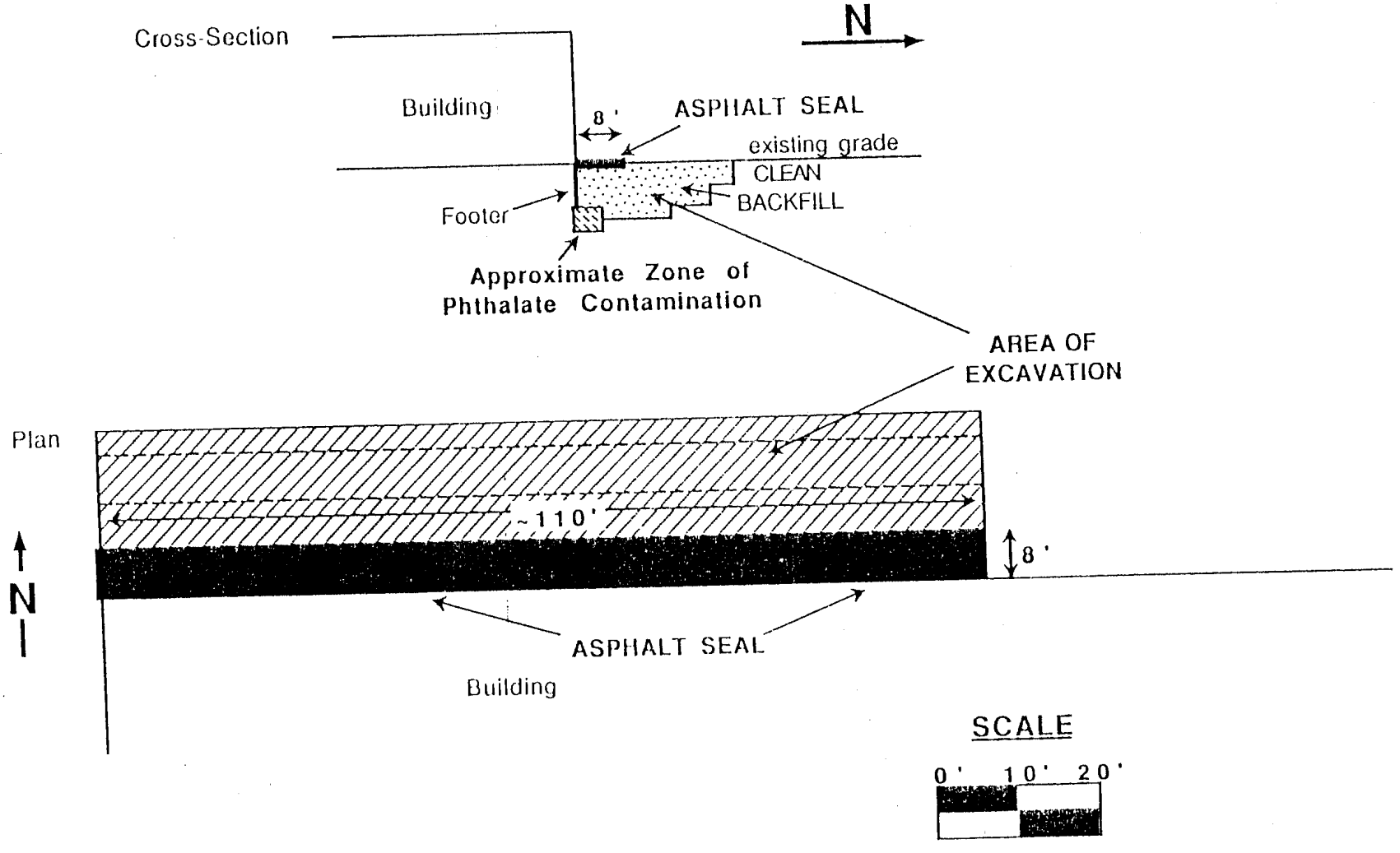
EMERGENCY EQUIPMENT

S MICHALOWSKI PLT ENGR
FABRIC LEATHER

BORDEN, INC. - GLEN COVE, NEW YORK

FIGURE 1

ESP/INCINERATOR EXCAVATION
AREA SEALED BY ASPHALT

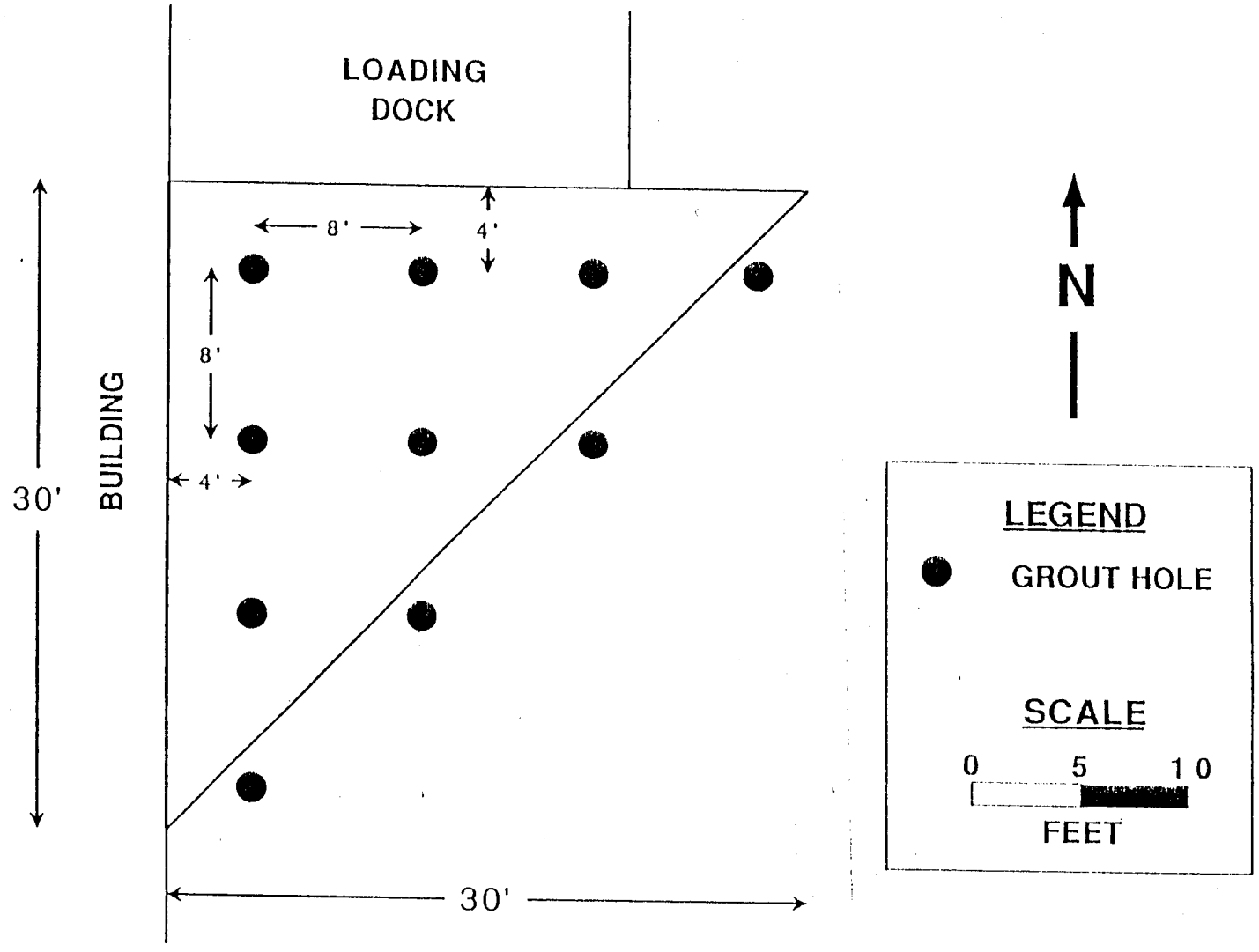


T.M. GATES, INC.

BORDEN, INC. - GLEN COVE, NEW YORK

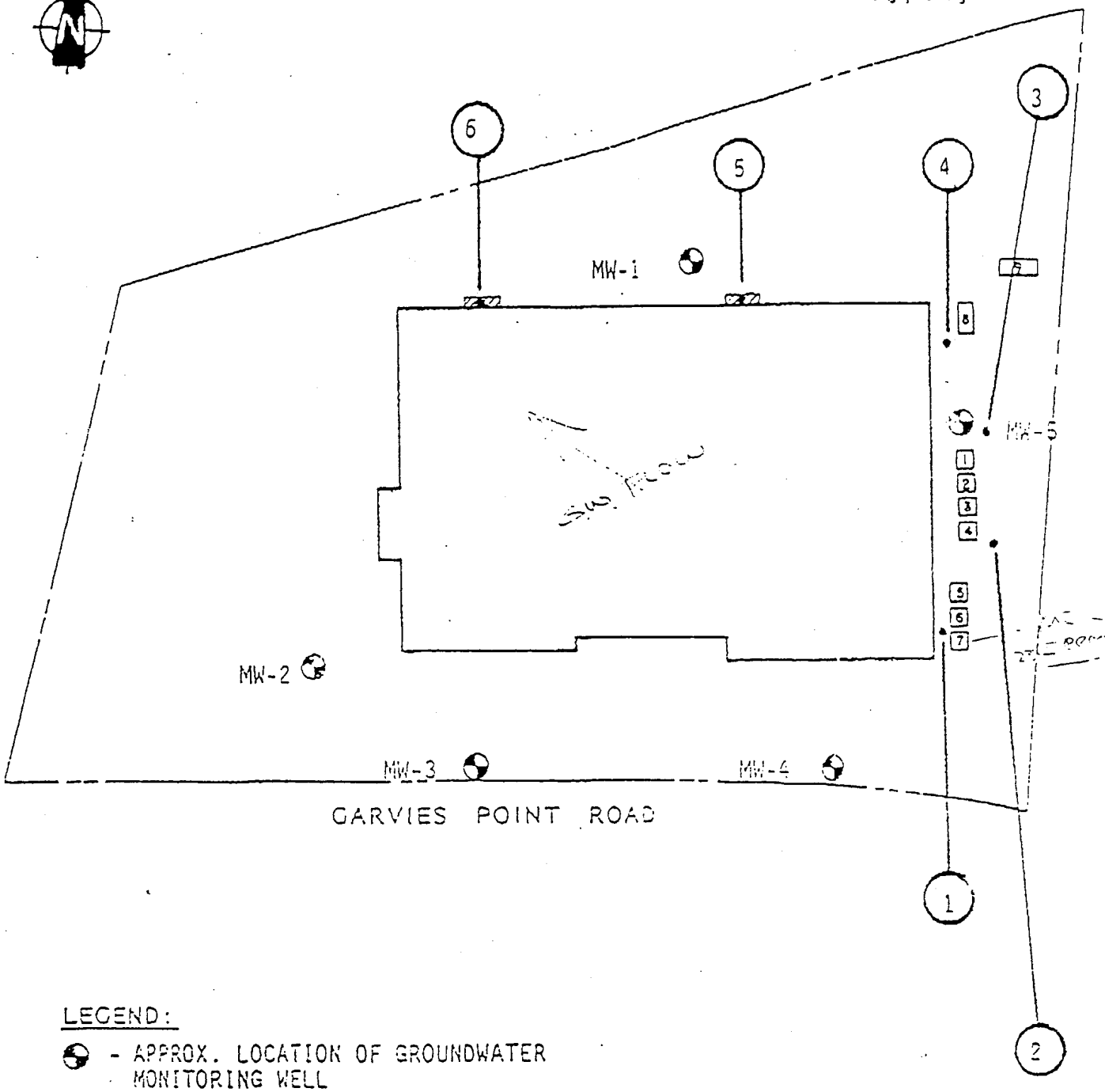
FIGURE 2

PRESSURE GROUTING PLAN



T.M.GATES, INC.

SOILS DATA



LEGEND:

- APPROX. LOCATION OF GROUNDWATER MONITORING WELL

1-3 - 5,000 GAL. U.S.T.

4 - 2,500 GAL. U.S.T.

5-7 - 1,500 GAL. U.S.T.

8 - 10,000 GAL. U.S.T.

9 - 20,000 GAL. U.S.T.

(1) LOCATION AND NUMBER OF SOIL SAMPLE

FIGURE 1

SAMPLING LOCATIONS
FABRIC LEATHER CORPORATION
GLEN COVE, NEW YORK

SITE PLAN

SCALE: 1" = 100'±

DE Killam

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ •NYD000910450

FABRIC LEATHER CORPORATION
40 CARVIES POINT ROAD
GLEN COVE NY 11542

INSTALLATION ADDRESS ➤ 40 CARVIES POINT ROAD
GLEN COVE NY 11542

EPA Form 8700-12B (4-80) 11/07/80

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	NYD008918450
I. NAME OF INSTALLATION	FABRIC LEATHER CORPORATION
II. INSTALLATION MAILING ADDRESS	40 GARVIES POINT ROAD GLEN COVE, NY 11542
III. LOCATION OF INSTALLATION	40 GARVIES POINT ROAD GLEN COVE, NY 11542

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F NYD008918450 T/A 3 C 1		800818

I. NAME OF INSTALLATION

FABRIC LEATHER CORPORATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 40 GARVIES POINT ROAD

CITY OR TOWN	ST.	ZIP CODE
GLEN COVE	NY	11542

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 40 GARVIES POINT ROAD

CITY OR TOWN	ST.	ZIP CODE
GLEN COVE	NY	11542

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*	PHONE NO. *(area code & no.)*
WILLIAM GOODGER PLANT ENGINEER	516-671-8220

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: BORDEN INC

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.:

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S												T/A	C
W	N	Y	D	0	0	6	9	1	8	4	5	0	2	1
1	2										13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F003	F005				
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U002	U159	U220	U238	U107	
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001)	[ ] 2. CORROSIVE (D002)	[ ] 3. REACTIVE (D003)	[X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
W. Bailey Barton	W. Bailey Barton, Director Environmental Affairs	8/7/80

DETACH

DETACH

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175 O/C

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F N.Y.D.0.0.8.9.1.8.4.5.0

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER: ~~NYD008918450~~

III. FACILITY NAME: ~~FABRIC LEATHER CORPORATION~~

V. FACILITY MAILING ADDRESS: ~~40 GARVIES POINT ROAD~~ ~~GLEN COVE, NY 11542~~

VI. FACILITY LOCATION: ~~40 GARVIES POINT ROAD~~ ~~GLEN COVE, NY 11542~~

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK "X" YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X	Form 3	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: Fabric Leather Corp

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 Goodger, William P.E. Engr.	516 671 8220

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 40 Garvies Point Road			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 Glen Cove L.I.	NY	11542	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 40 Garvies Point Road			
B. COUNTY NAME			
Nassau			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE *(if known)***
6 Glen Cove	NY	11542	

EPA Form 3510-1 (6-80)

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST		B. SECOND	
2295	(specify) Expanded Vinyl	3079	(specify) Unsupported Vinyl
C. THIRD		**D. FOURTH**	
	(specify)		(specify)

VIII. OPERATOR INFORMATION

A. NAME: Borden Inc.

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)

P (specify)

D. PHONE (area code & no.): A 614 225 4000

E. STREET OR P.O. BOX: 180 E. Broadway

F. CITY OR TOWN	G. STATE	H. ZIP CODE
Columbus	OH	43215

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
N	P
B. UIC (Underground Injection of Fluids)	**E. OTHER (specify)**
U	(specify)
C. RCRA (Hazardous Wastes)	**E. OTHER (specify)**
R	280500 3694 (specify) Misc. State Air Permits

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacturer of fabric supported and unsupported expanded and solid vinyl products.

F9:14
51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert W. Gutheil, President Borden Chemical	[signature]	11/17/1980

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S												T/A	C
F	N	Y	D	0	0	8	9	1	8	4	5	0	3	1
1	2											13	14	15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* (71)

[ ] 2. NEW FACILITY *(Complete item below.)* (71)

C 8 (15)

YR.	MO.	DAY
67	01	01
73 74	75 76	77 78

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
73 74	75 76	77 78

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS (72)

[ ] 2. FACILITY HAS A RCRA PERMIT (72)

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S			T/A	C
C	DUP			1
1	2 - 13		14	15

LINE NUMBER	A. PROCESS CODE (from list above) (16 - 18)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify) (19 - 27)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code) (28)	FOR OFFICIAL USE ONLY (29 - 32)
X-1	S02	600	G	
X-2	T03	20	E	
1	S01	4200000	G	
2	S02	30,000000	G	
3				
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): WNYD008918450 T/A: 3 C: 1

FOR OFFICIAL USE ONLY: W DUP T/A: 3 2 C: DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F003	45000	T	S01 S02	
2	D005				
3	D006				
4	D007				
5	D008				
6	U002				
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

F6: A 55

F6: A 56

EPA I.D. NO. *(enter from page 1)*

															T/A	C
F	N	Y	D	0	0	8	9	1	8	4	5	0			3	6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
40 51 33.0	073 38 45.6

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E Borden Inc	614-225-4292

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 180 E Broad St.	G Columbus	OH	43215

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Robert W. Gutheil, President Borden Chemical	Robert W. Gutheil	11/17/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

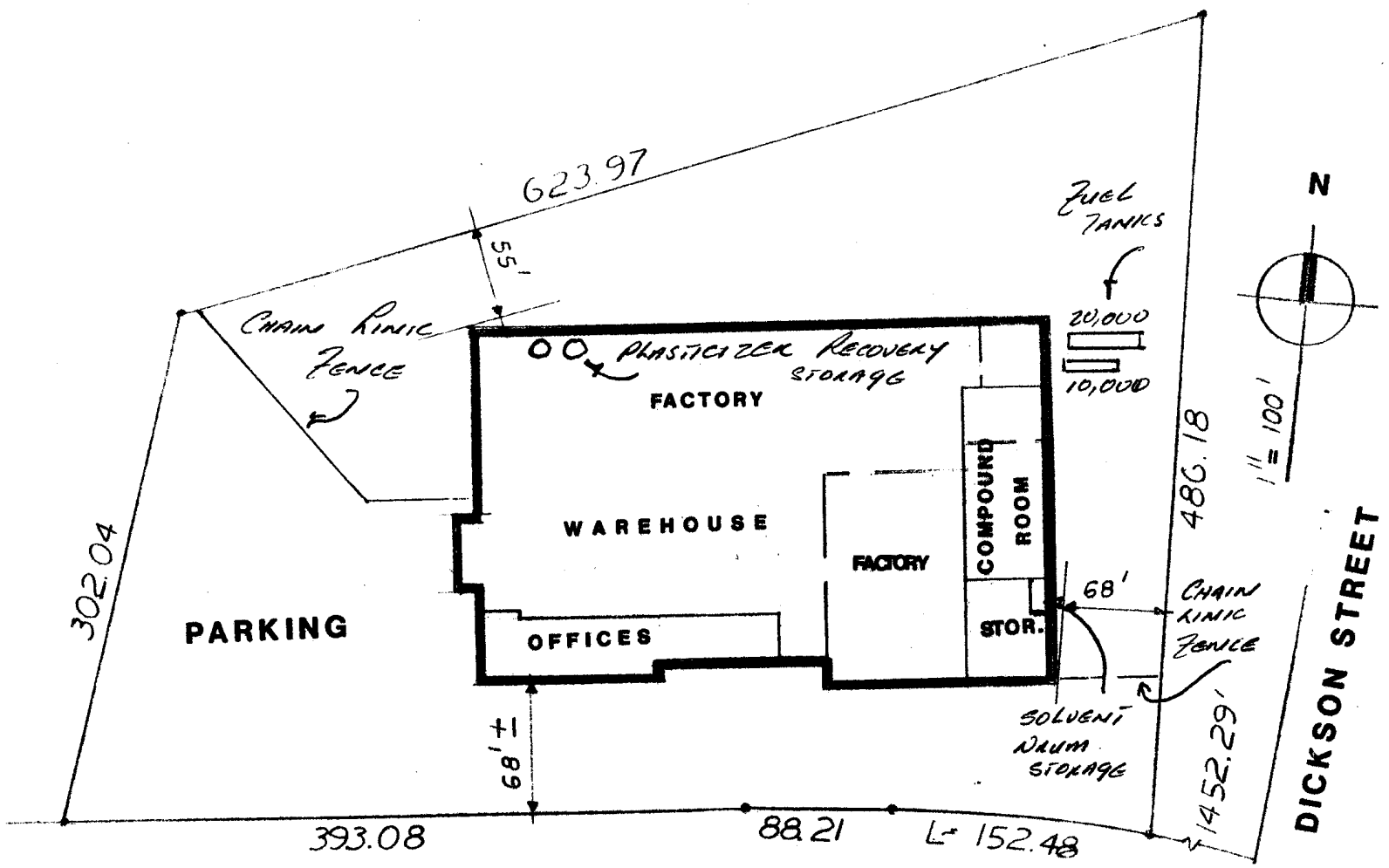
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

NYD008918450

PERMIT APPLICATION FOR A FACILITY TO TREAT, STORE OR DISPOSE OF HAZARDOUS WASTES
PART A, FORMS 1 AND 3

SUBMISSIONS TO US EPA REGION II
November 18, 1980

FACILITY	CITY	STATE
Borden Chemical, Adhesives & Chemicals Div.	Middlesex	NJ
Borden Chemical, Printing Ink Div.	Camden	NJ
Borden Chemical, Adhesives & Chemicals Div.	Brooklyn	NY
Borden Chemical, Printing Ink Div.	Fairlawn	NJ
Borden Chemical, Consumer Products Div.	Bainbridge	NY
Borden Chemical, Printing Ink Div.	Depew	NY
Borden Chemical, Adhesives & Chemicals Div.	Bainbridge	NY
Fabric Leather	Glen Cove	NY
Borden Can Manufacturing	Lyons	NY
Industrias La Famosa	Bayamon	PR



GARVIES POINT ROAD

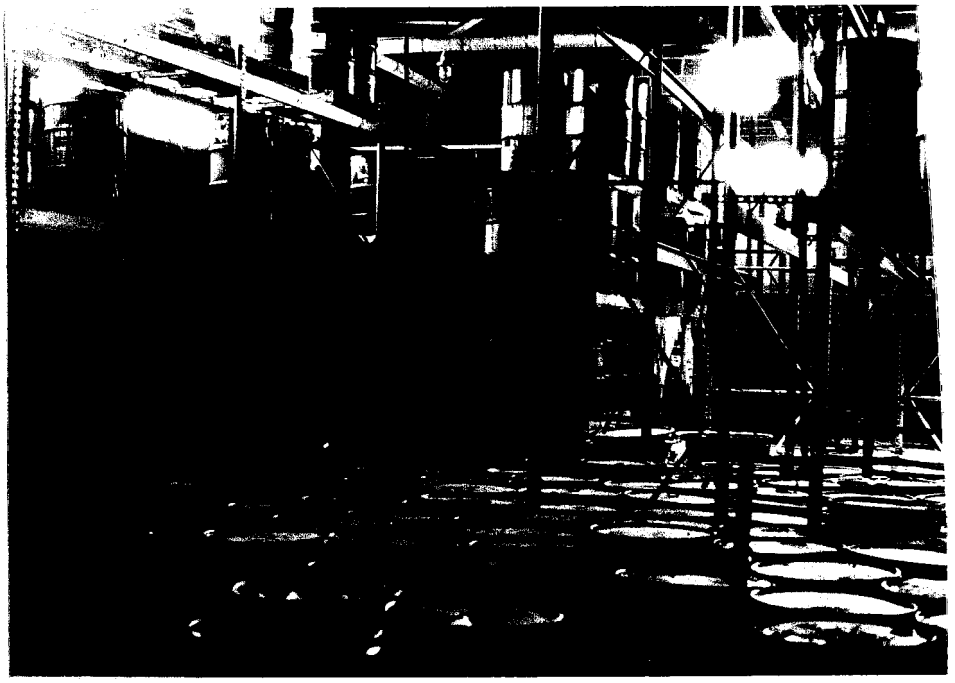
FABRIC LEATHER CORP.

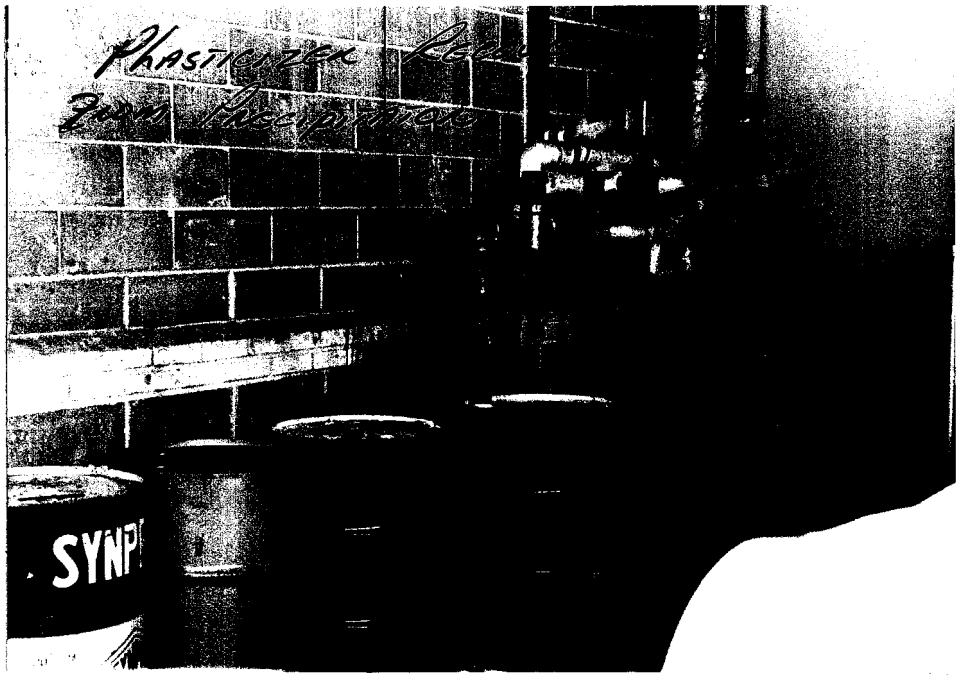
40 GARVIES POINT ROAD

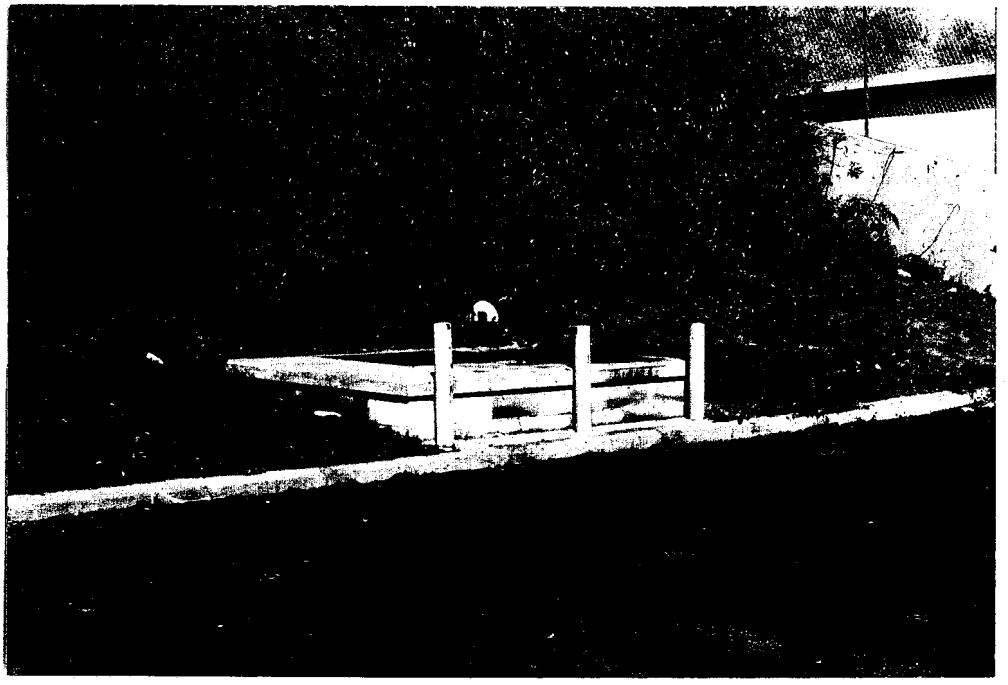
GLEN COVE, NEW YORK

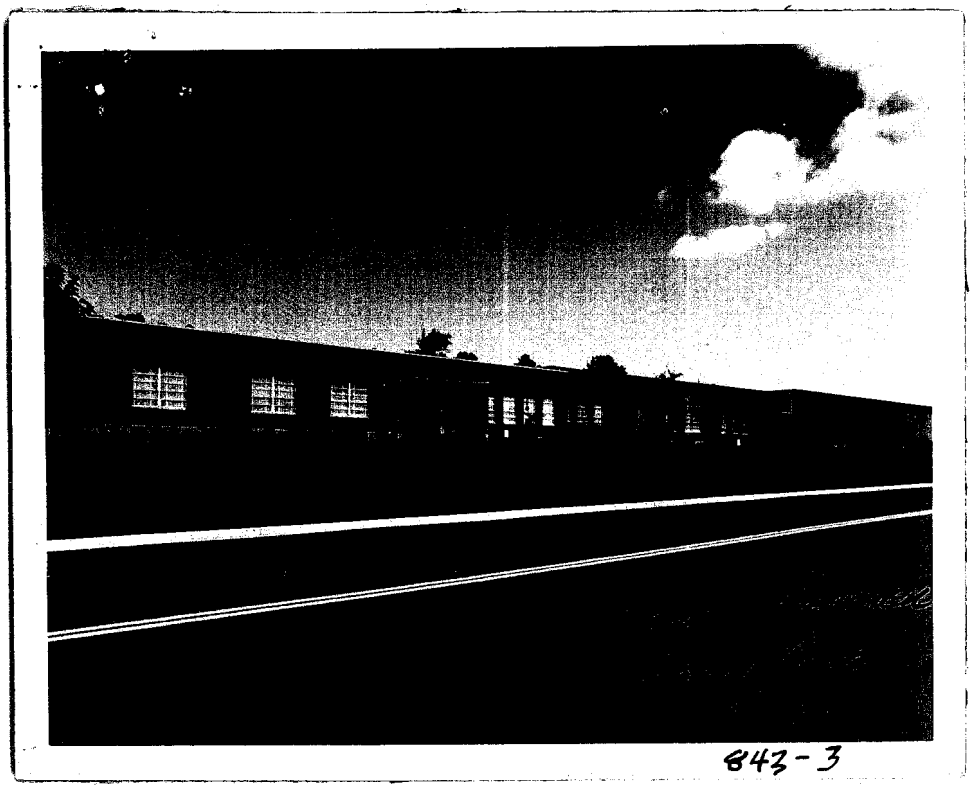
A H SALKOWITZ

JAMAICA NEW YORK




SYNP





843-3

BORDEN INC
180 EAST BROAD STREET, COLUMBUS, OHIO 43215
TELEPHONE: (614) 225-4298

DAVID L. BURRE, P.E.
ENGINEER, ENVIRONMENTAL AFFAIRS
OFFICE OF THE TECHNICAL DIRECTOR

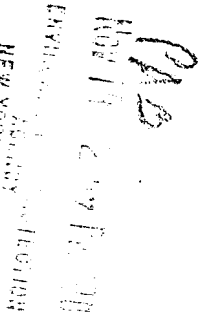
EXPRESS MAIL

Hand Delivered

November 18, 1980

Received by _____ _____
USEPA Region II Date

Mr. Harry Ruisi
EPA Region II
Information Service Center
26 Federal Plaza
New York, NY 10007



Re: RCRA
Permit Application for a Facility to Treat, Store or Dispose of Hazardous Wastes
Part A, Forms 1 and 3, US EPA Consolidated Permits Program

Dear Mr. Ruisi:

Enclosed are the above referenced forms for Borden, Inc. plants in your Region. A list of these plants is attached. This submission is being made as required by Section 3005 of the Resources Conservation and Recovery Act for facilities which have already made Notification of Hazardous Waste Activity under the Act.

The plants for which these applications are made generate wastes which may be considered to be hazardous wastes under definitions of the Act or interpretation of these definitions by Borden. The TSD activities conducted by these plants vary from the potential for storage of hazardous wastes over 90 days to full time treatment and on-site disposal of self generated industrial wastes. In many cases the activity centers around wastewater treatment and associated sludges.

Application is also being made for Borden plants which could be classified as small quantity generators or for TSD activities which as a result of prior treatment or handling no longer involve hazardous wastes.

As a result of the foregoing, Borden may modify or revoke some of these applications as RCRA regulations become clarified or directed by US EPA recommendations.

I trust that these submissions are satisfactory under the Act. Any questions you have may be addressed to the location contact or the undersigned.

Sincerely,

David L. Burre, P.E.

DLB;ls

Encl.

DATE RETURNED _____

REASON _____

☐ ACKNOWLEDGEMENT SENT

INTERNAL CHECKLIST ID # NYD008918452

1. Interim Regulatory Requirements

conf

A. (1) FORM 1 MISSING ☐

(2) FORM 3 MISSING ☐

B. POSTMARK after NOVEMBER 19, 1980 ☐ Valid ☐

C. (1) DATE of OPERATION MISSING ☐

(2) DATE of OPERATION after NOVEMBER 19, 1980 ☐

D. (1) NON-NOTIFIER ☐
(2) NOTIFIED after AUGUST 18, 1980 ☐ Valid ☐

E. (1) FORM 1, ~~X~~III B SIGNATURE MISSING ☐

(2) FORM 3, IX B SIGNATURE MISSING ☐

2. A. HANDLER ☐

B. NONREGULATED ☐

C. UNSURE ☐

D. UNKNOWN FACILITY (missing name and address on Form 3) ☐

E. NEW FACILITY > NOV. 19, 1980 ☐

F. CORE ITEM(S) MISSING ☐

G. NON-CORE ITEM(S) MISSING ☐

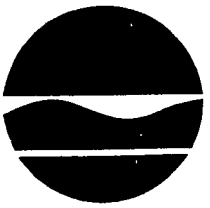
H. OTHER ☐

MISSING:
MAP ☐
DRAWING ☐
PHOTO ☐

AOIC

FILEROOM

New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Hazardous Waste Facilities
50 Wolf Road, Albany, New York, 12233-7252
(518) 457-9255 Fax (518) 457-9240



John Cahill
Acting Commissioner

Mr. Goodger
Fabric Leather Corp
40 Garvies Point Road
Glenn Cove, NY 11794

JUN 2 3 1997

Dear Mr. Goodger:

Re: Fabric Leather Corp
EPA Identification Number NYD008918450
RCRA Facility Assessment - VSI Notification Letter

Your facility treated, stored, or disposed of hazardous waste and accordingly sought a permit under the Resource Conservation and Recovery Act of 1976 (RCRA). Pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA), such a facility is subject to RCRA Corrective Action. Therefore, as a first step in the corrective action process, a RCRA Facility Assessment (RFA) is required to determine whether releases of hazardous waste and/or hazardous constituents occurred or are occurring from your facility. The assessment will determine if any such releases exist and if so, whether they require further investigation and the implementation of corrective measures.

Department personnel reviewed the information file on your facility that is located in the Albany Office. The review included examination of a RFA-Preliminary Review which summarizes the findings of the various assessment activities and recommendations for further action or no further action at Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). The available file material was used to identify your facility's SWMUs and AOCs.

A Solid Waste Management Unit is defined as any discernible unit at which solid wastes have been placed at any time irrespective of whether the unit was intended for the management of hazardous or solid wastes. Such units include any area at the facility at which solid wastes have been routinely and systematically released. Sewer systems, including sewer lines, drains, man-holes, sumps, and dry-wells transporting or storing contaminated wastewater, including contaminated storm water, are considered SWMUs by RCRA. However, RCRA corrective action will only be concerned with investigating releases of hazardous waste

and/or hazardous constituents from such units.

For the purpose of this assessment and to facilitate delineation of other releases from the facility, the Area of Concern is defined as an area at the facility, or an off-site area, which is not at this time known to be a SWMU, where hazardous waste and/or hazardous constituents are present, or are suspected to be present, as a result of a release from the facility. The term shall include areas of potential or suspected contamination as well as actual contamination.

The next step in the RFA process is a Visual Site Inspection (VSI) of your facility to verify locations of all SWMUs and AOCs, to determine their condition by visual observation, and to resolve any information gaps identified during the file review. In order to conduct the VSI as efficiently as possible, the current status of all SWMUs and AOCs must be known. Therefore, a copy of the RFA-Preliminary Review is enclosed for review by facility personnel knowledgeable in the environmental status of the plant site. In addition, a copy of a SWMU Questionnaire is included for completion. After reading the RFA-Preliminary Review, please fill out the questionnaire to correct any errors, to provide additional information on a SWMU/AOC, or to include information on SWMUs/AOCs not discussed in the RFA-Preliminary Review. The facility must identify both active and inactive sewer systems conveying hazardous waste and/or hazardous constituents, including pipelines with discharges currently subject to SPDES regulation and pipelines with discharges that were not subject to SPDES regulation in the past. Identify the surface water body into which wastewater or storm water discharged. Please return the completed questionnaire, along with the name of the designated facility contact person and their telephone number, within thirty (30) calendar days of the date of this letter to:

Henry Wilkie
Environmental Engineer I
NYSDEC
Division of Solid & Hazardous Materials
Bureau of Hazardous Waste Facilities
50 Wolf Road, Albany, New York, 12233-7252

After receipt and review of the completed questionnaire, Department personnel will contact the designated individual to schedule our inspection. The VSI will require the assistance of some of your personnel in reviewing current and past solid waste management practices during the inspection. We are requesting permission to take photographs of the SWMUs and AOCs to document the condition of the units and the areas.

Should you have any questions regarding the contents of this letter, please contact me at (518) 457-9255. I would like to thank you for your anticipated assistance in this matter.

Sincerely,

Henry Wilkie
Environmental Engineer I
Bureau of Hazardous
Waste Facilities
Division of Solid & Hazardous
Material

cc: J. Reidy, EPA Region II (w/o)
Anthony Cava, DEC Region 1

15 (12-75)

New York State Department of Environmental Conservation

MEMORANDUM

TO: Paul Counterman, Director, Bureau of Hazardous Waste Facility Permitting
FROM: John E. Iannotti, Director, Bureau of Hazardous Waste Program Development
SUBJECT: RCRA Closure, CAPT LOIS and Remediation Overlapping Sites

DATE: FEB 2 2 1989

The Fabric Leather Corporation Site in Glen Cove, Nassau County (NYD008918450) was reclassified via an approved closure certification on March 6, 1986. A CAPT LOIS Review was performed on September 30, 1988. As a result of that review, it was determined that a preliminary site assessment was already in progress and that a review of the results were necessary prior to the termination of the sites interim status. These results, prepared by Killam Associates, the company's consultant, and dated November 11, 1988 were received and reviewed. Killam recommends a soil excavation plan and further groundwater monitoring.

Due to the detail of soil and groundwater remediation plans for this site, lead review should be shifted to a Bureau with appropriate soil and groundwater rememdiation experience.

Therefore, I am recommending that the lead review for this site be transferred to your Bureau for appropriate action.

I do not envision many situations like this to occur and anticipate only two or three additional cases in the next several months. Please contact me if you have questions.

Thank you.

cc: Jim Moran

F 11.1

New York State Department of Environmental Conservation

MEMORANDUM

TO: James Sibbald Moran, Chief, Facility Closure Section
FROM: Michelle M. Taylor, Assistant Sanitary Engineer MMT
SUBJECT: CAPT LOIS Site Visit for Fabric Leather Corp., Glen Cove, NY, NYD00891850 4 A
DATE: September 30, 1988

On September 14, 1988, Agnes Gara of the Region 1 Office and I met with Mr. Goodger of the subject facility. The facility was certified closed on March 6, 1986. The facility is expected to be sold in October 1988. The following is a summary of our corrective action evaluation.

A. General Information

1. Facility manufactures expanded vinyl. Polyvinyl chloride resin is the base; mixed with solvents; imitation leather is the final product. Wastes are generated from roller washing operations and formerly for elctrostatic precipitator. Wastes are currently stored in drums and removed in less than 90 days.

2. Facility operations began in 1966 - new construction. Site was previously part of a dump. An area of the dump approximately 100 yards away and downhill is a Superfund site.

3. Site is located in Nassau County, in light-industrial area.

B. Solid Waste Management Areas (locate on site diagram)

1. Underground tanks - 20,000 gallon and 10,000 gallon underground tanks, previously used to store solvents and blended petroleum products for heating were emptied in 1985. The tanks were closed in accordance with 6NYCRR Part 360.

2. Container Storage Area - Indoor storage in 55 gallon drums for less than 90 days. Typical wastes stored include:

   F003 - solvents containing methylene chloride
   F002 - solvents containing toluene and naphtha
   F005 - resins contaminated with the above solvents. Approximately 15 drums a month are generated.

3. Incinerator - Burns exhaust from machines (air permit). Formerly, an electrostatic precipitator was used.

4. Wastewater Permit - Non-contact cooling water is discharged under permit #NY0140546.

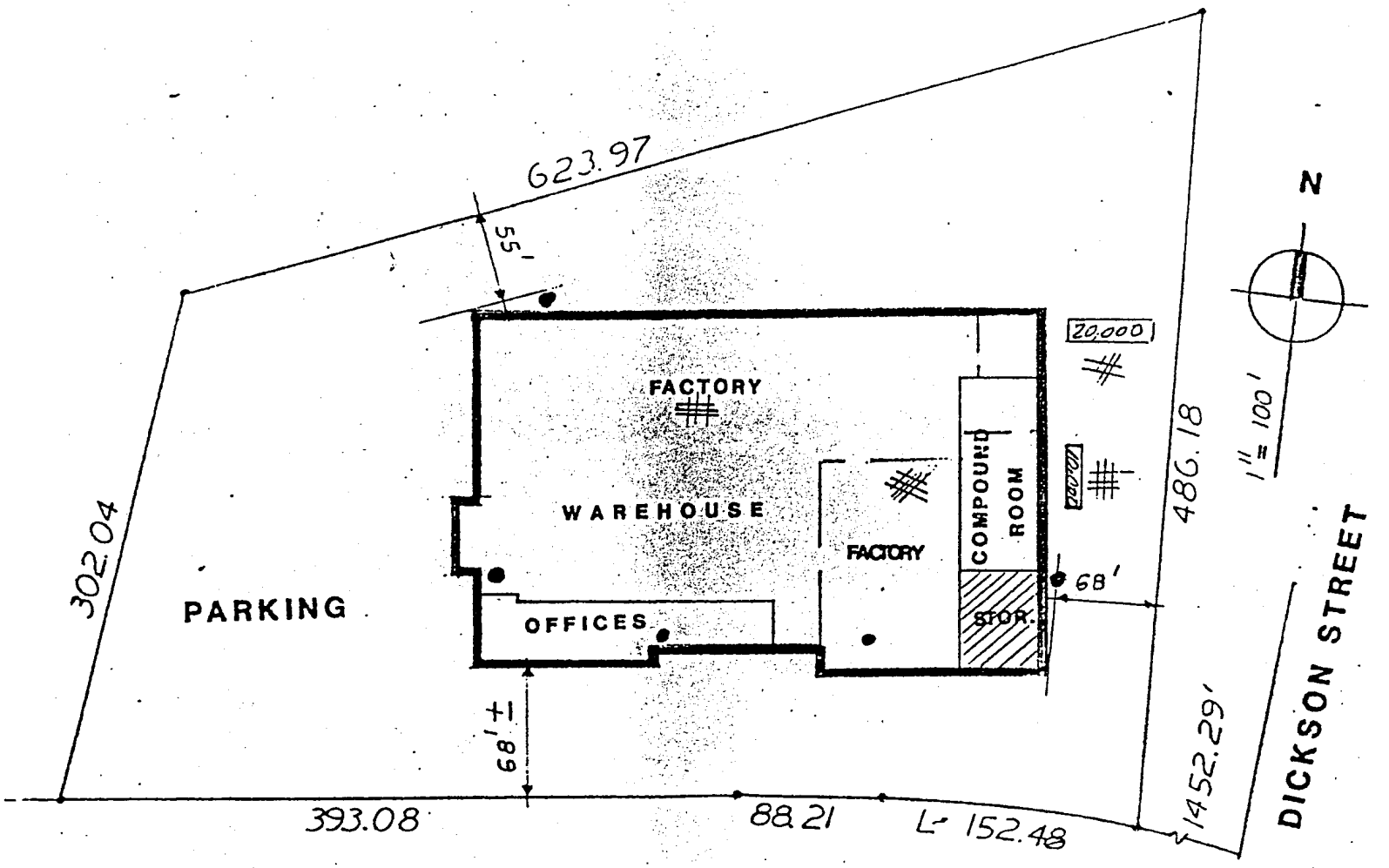
C. Summary and Recommendations

Site will be closing in late October, 1988, and an environmental and groundwater assessment is to be conducted as part of the sale. The results of the assessment should be sought before making a decision to terminate the site's interim status.

I would also recommend referring this site to USEPA for review under the Environmental Priorities Initiative (EPI) because of its location on an old dump.

Attachments

received 12/14/88.
They recommend groundwater monitoring. It is not in the RCRA sections' jurisdiction to comment / oppose such a plan.
- WPDR



= Hazard Waste Location

● Telephone's

FABRIC LEATHER CORP.

40 GARVIES POINT ROAD

GLEN COVE, NEW YORK

A H SALKOWITZ

JAMAICA NEW YORK

EXISTING ENVIRONMENTAL PERMITS -- (1985)

A. EPA Acknowledgment of Notification of Hazardous Waste Activity NYD 008978450.

B. Bureau of Waste Water Management Permit No. NY 0140546

C. DEC Permits
Facility No. 2805003694
Fume Incinerator
Emission Point 00007 -- Covers Casting Line Stacks 1 through 5, and Print Machine No. 1, Emission Point 6.

D. Facility No. 2805003694
Emission Point 00008 -- Electrostatic Precipitator covers Casting Line Stacks 1 through 5

E. Facility No. 2805003694
Emission Point 00009 -- Dust Collector

F. Facility No. 2805003694
Emission Point 00006 -- Print Machine No. 1

G. Facility No. 2805003694
Emission Point 00010 -- Print Machine No. 2

H. Facility No. 2805003694
Emission Point 00011 -- Lint Remover

I. Facility No. 2805003694
Emission Point 00012 -- Lint Remover

J. Facility No. 2805003694
Emission Point 00013 -- Boiler 40 H.P. S/N 1-012049

K. Facility No. 2805003694
Emission Point 00002 -- Boiler 150 H.P. S/N 1-012537

L. Facility No. 2805003694
Emission Point 00001 -- Boiler 150 H.P. S/N 1-012536

Solvent Burning -- BAQM Serial Letter 75-81
April 14, 1981

BORDEN INC
165 N. WASHINGTON AVENUE, COLUMBUS, OHIO 43215

April 17 1986

THOMAS R. HEATON
ENVIRONMENTAL SPECIALIST
ENVIRONMENTAL AFFAIRS

P32 = A
P33 =
C1105 = + ✓

Mr. Richard A. Baker
Chief
Permits Administration Branch
USEPA - Region II
26 Federal Plaza
New York, NY 10278

Re: Borden Chemical,
Fabric Leather Corporation,
USEPA ID #NYD008918450 ← Not in PDS

Dear Mr. Baker:

In accordance with the attached letter from New York State Department of Environmental Conservation, Borden officially requests that USEPA deny the Part B Permit for Fabric Leather Corporation. Borden has satisfactorily met all closure requirements for RCRA-TSD portions of this facility and does not pursue a final Part B permit.

Please notify this office of USEPA acknowledgement of the interim status termination. Call me at 614/225-4860 if you have any questions.

Sincerely,

Thomas R Heaton

Thomas R. Heaton

TRH/slw

cc: Mr. Stan Siegel, USEPA
Mr. John Middelkoop, P.E., NYSDEC
Mr. Robert Becherer, P.E., NYSDEC

CERTIFIED MAIL RETURN RECEIPT REQUESTED

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

Henry G. Williams
Commissioner

APR 07 1986

Mr. Stephen J. Michalowski
Plant Engineer
Fabric Leather Corporation
40 Garvies Point Road
Glen Cove, New York 11542

Dear Mr. Michalowski:

Re: Fabric Leather Corporation, EPA ID. No. NYD008918450

This letter confirms receipt by this office of both owner/operator and engineering certification of closure of the referenced facility. Upon review of our records, it is deemed that all applicable regulatory requirements in conjunction with closure of the RCRA-permitted portions of the referenced facility have been met.

In order to terminate the facility's interim status, an official formal request to deny the Part B Permit for the subject facility should be made, in writing, to the U.S. Environmental Protection Agency (USEPA). Upon receipt of this request, the USEPA will then publish a Notice of Intent to deny the RCRA Part B application for your facility. Following the required comment period for this notice, you will be notified by the USEPA insofar as termination of your facility's interim status. Please note that this step is legally required in order to have the facility's interim status withdrawn.

The aforementioned request should be forwarded, within 30 days from the date of this letter to:

Mr. Richard A. Baker
Chief
Permits Adminstration Branch
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

with copies to:

Mr. Stan Siegel
Chief
Compliance and Enforcement Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Mr. John L. Middelkoop, P.E.
Supervisor
Permit Section
Division of Solid and Hazardous Waste
Room 401
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, NY 12233

Mr. Robert Becherer, P.E.
Regional Solid Waste Engineer, Region 1
New York State Department of
Environmental Conservation
Building 40
SUNY @ Stony Brook
Stony Brook, NY 11790

If you should have any questions or comments regarding the above, please contact Ms. Michelle Taylor at (518) 457-3274.

Sincerely,

Randy S. McDermott, P.E.
Senior Sanitary Engineer
Permit Section
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

cc: R. Baker
S. Siegel
J. Middelkoop
R. Becherer

✓C1103=X
1/15/88

R. Baker

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

Henry G. Williams
Commissioner

April 2, 1986

no perm. records

Mr. Stephen J. Michalowski
Plant Engineer
Fabric Leather Corporation
40 Garvies Point Road
Glen Cove, NY 11542

Dear Mr. Michalowski:

Re: Fabric Leather Corp., Glen Cove, New York
(EPA I.D. No. NYD008918450)

This letter confirms receipt by this office of both owner/operator and engineering certification of closure of the referenced facility. Upon review of our records, it is deemed that all applicable regulatory requirements in conjunction with closure of the RCRA-permitted portions of the referenced facility have been met.

In order to terminate the facility's interim status, an official formal request to deny the Part B Permit for the subject facility should be made, in writing, to the U.S. Environmental Protection Agency (USEPA). Upon receipt of this request, the USEPA will then publish a Notice of Intent to Deny the RCRA Part B application for your facility. Following the required comment period for this notice, you will be notified by the USEPA insofar as termination of your facility's interim status. Please note that this step is legally required in order to have the facility's interim status withdrawn.

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Mr. Richard A. Baker
Chief
Permits Administration Branch
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

with copies to:

Mr. Stan Siegel
Chief
Compliance and Enforcement Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Mr. John L. Middelkoop, P.E.
Supervisor
Permit Section
Division of Solid and Hazardous Waste
Room 401
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, NY 12233

Mr. Robert Becherer
Regional Solid Waste Engineer
New York State Department of
Environmental Conservation
Building 40
SUNY - Stony Brook
Stony Brook, NY 11794

If you should have any questions or comments regarding the above, please contact Ms. Michelle Taylor at (518) 457-3274.

Sincerely,

Randy S. McDermott, P.E.
Senior Sanitary Engineer
Permit Section
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

cc: R. Baker
S. Siegel
J. Middelkoop
R. Becherer

RCRA INSPECTION REVIEW SHEET

450

Name of Facility - Fabric Leather Corporation
RCRA ID# - NYDO 0891 8450
Date of Inspection - 8/26/81
Type of Inspection: (Generator) Transporter (TSD)
Name of EPA/State Inspector - J. Josephs

Findings of Inspection:

Some improvements desirable regarding waste analysis, inspections, training records and closure plan.

Action(s) Taken: —

Action(s) Recommended: Request facility to address deficiencies by letter.

RCRA GENERATOR INSPECTION FORM

450

COMPANY NAME: Fabric Leather Corp. EPA I.D. NUMBER: NYDO 089 18450

COMPANY ADDRESS: 40 Garvies Point Road
Glen Cove, New York

COMPANY CONTACT OR OFFICIAL:
William Goodger

TITLE: Plant Engineer

INSPECTOR'S NAME:
Jonathan Josephs

BRANCH/ORGANIZATION:
Water Facilities Branch/EPA

CHECK IF FACILITY IS ALSO A TSD FACILITY ☒

DATE OF INSPECTION:
8/26/81

	YES	NO	DON'T KNOW
(1) Is there reason to believe that the facility has hazardous waste on site?	X		

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☒ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	___	X	___

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

Spent solvents (e.g. acetone, methyl ethyl ketone). Bottoms from high-flash point naptha storage. Approximately 50 drums. Two tanks of 30,000 gal combined capacity.

d. Describe the activities that result in the generation of hazardous waste.

Manufacture of polyvinyl chloride synthetic leather. Spent solvents used to wash printing and finishing machines. Metals (cadmium, lead, etc.) picked up from pigments.

(2) Is hazardous waste stored on site?	X	___	___
a. What is the longest period that it has been accumulated?	Not ascertained. Prior to 11/19/81.		
b. Is the date when drums were placed in storage marked on each drum?	X	___	___
(3) Has hazardous waste been shipped from this facility since November 19, 1980?	___	X	___

a. If "yes," approximately how many shipments were made?

(4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980? None

a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?	___	___	___

b. If "no" or "don't know," please elaborate.

	YES	NO	DON'T KNOW
c. Does each manifest (or a representative sample) have the following information?			
- a manifest document number	___	___	___
- the generator's name, mailing address, telephone number, and EPA identification number	___	___	___
- the name, and EPA identification number of each transporter	___	___	___
- the name, address and EPA identification number of the designated facility and an alternate facility, if any:	___	___	___
- a description of the wastes (DOT)	___	___	___
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	___	___	___
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	___	___	___
(5) Were there any hazardous wastes stored on site at the time of the inspection?	X	___	___
a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?	X	___	___
b. If not properly packaged or in secure tanks, please explain.			
c. Are containers clearly marked and labelled?	X	___	___
d. Do any containers appear to be leaking?	___	X	___
e. If "yes," approximately how many?			

*(6) Has the generator submitted an annual report to EPA covering the previous calendar year? Not applicable

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago? Not applicable

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

(8) General comments.

Most wastes are burned for energy recovery in boilers on site. The only hazardous waste which will be disposed off-site is the bottoms from spent naptha. Since there isn't much of this waste, it hasn't been shipped off-site since 11/19/81. Spent solvents are also received from off-site for burning for heat recovery.

Jonathan Josephs
8/27/81

* The effective date for this requirement is March 1, 1982.

47-15-15 (7/82)

RCRA INSPECTION FORM

Report Prepared for:

Generator [X]

Transporter [ ]

HWM (TSD) facility [X]

Copy of report sent to the facility [ ]

(13)

Location Code: 28 Ø5ØØ

Facility Information

Name: FABRIC LEATHER CORP

Address: 40 GARVIES POINT RD.
GLEN COVE, NEW YORK

EPA ID#: NYD 008918 ~~X~~ 9a 450

Date of Inspection: FEB 11, 1983

Participating Personnel

State or EPA Personnel: AUGUST LARUFFA

Facility Personnel: WILLIAM GODGER - ENGINEERING MGR.
LARRY DONNELLEY - CONSULTANT

Report Prepared by Name: AUGUST LARUFFA

Agency: NYSDEC REG 1

Telephone #: (516) 751-7900

Approved for the Director by: [signature]
Regional Solid Waste Engineer
Region 1 - NYSDEC

Summary of Findings

Facility Description and Operations

MANUFACTURER OF EXPANDED VINYL SYNTHETIC "LEATHER" FABRIC - CONSISTING OF PVC CASTING LINE, TWO PRINT LINES. FACILITY USES SOLVENT GENERATED ON-SITE & BROUGHT IN FROM OFF-SITE TO BLEND WITH FUEL OIL IN VARIOUS PERCENTAGES UP TO 100% SOLVENT - PER NYSDEC AIR PERMIT

Describe the activities that result in the generation of hazardous waste.

① WASHING OF PRINT ROLLS WITH MEK, ACETONE, TOLUENE

② WASHING OF CASTING LINE WITH NAPTHA

③ WASHING OF TRANSFER VAT IN COMPOUND ROOM WITH NAPTHA

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

ACETONE	- F003	58 DRUMS SOLID SLUDGE
MEK	- F005	10 DRUMS LIQUID
TOLUENE	- F005	
NAPTHA	- D001 ~~NON-HAZARDOUS~~	

Is there reason to believe that the facility has hazardous waste on-site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate boxes:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☒ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

Transporter Inspection Report Form

N/A

40 CFR Part 263 Transporter Standards	YES	NO	N/A
263.10 - Does the transporter carry hazardous waste?	___	___	___
263.12 - Does the transporter store hazardous waste at a transfer facility - if yes, how long? _____10 days or less _____more than 10 days (complete TSD form)	___	___	___
263.20 - Manifest System			
1) Does the transporter have a copy for each manifest shipment of hazardous waste?	___	___	___
2) Does a representative portion of the manifests show the following information (if no, circle the missing information)	___	___	___
o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature	___	___	___
o Transporter's name, EPA I.D. number, signature and date of signature	___	___	___
o TSDF's name, address and EPA I.D. Number	___	___	___
and either the signature and date of the TSDF or the name, EPA I.D., signature and date of the next transporter.	___	___	___
o Manifest Document number	___	___	___
o Proper DOT shipping description	___	___	___
o Quantity & type of containers	___	___	___
(If no, to any of the above obtain copies of incomplete manifests).			
3) Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain	___	___	___
262.22 - Have records been kept since November 19, 1980?	___	___	___
263.30 - Has there ever been a spill or discharge of hazardous waste during transportation?	___	___	___
If yes, was the incident report submitted to DOT? (obtain copy of the report)	___	___	___
263.31 - If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.	___	___	___

General Comments:

HAZARDOUS WASTE MANAGEMENT FACILITY CHECK LIST
(Facilities Subject to 40 CFR 265 Standards)

	YES	NO	N/A
40 CFR Part 265 Subpart B General Facility Standards			
265.13-General Waste Analysis			
1) Is there a detailed chemical and physical anaylsis of a representative sample of the waste or each waste? (At a minimum this analysis must contain all the information necessary for proper management of the waste)	✓		
2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? You may check only one			
Waste characteristics vary			
All waste are basically the same	✓		
Company treats all waste as hazardous			
3) Is there a written waste analysis plan at the facility?	✓		
Does it contain the following:			
a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.	✓		
b) Test methods used to test these parameters.	✓		
c) Sampling methods to obtain a representative sample of the waste to be analyzed.	✓		
d) Frequency of repeated analysis to ensure accurate and current information.	✓		
4) Does hazardous waste come to this facility from an outside source? e.g. another generator.	✓		
5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest?	✓		
265.14-Security			
1) Is there: a) a 24-hour surveillance system? or, b) a suitable barrier which completely surrounds the active portion of this facility?	✓		
2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	✓		
If no, explain what measures are taken for security.			
265.15 - General Inspections Requirements			
1) Does the facility have a written inspection schedule?	✓		
2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?	✓		
3) Does the owner/operator record inspections in a log?	✓		
4) Is there evidence that problems reported in the inspection log have been remedied?			✓
If no, please explain.			

265.16 - Personnel Training	YES	NO	N/A
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	✓		
If yes, have facility personnel taken part in an annual review of training?	✓		
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?	✓		
—type and amount of training to be given to personnel in jobs related to hazardous waste management?	✓		
—actual training or experience received by personnel?	✓		
3) Are training records kept on all employees for at least 3 years?	✓		

265.17-General Requirements for Ignitable, Reactive or Incompatible Wastes

1) Are there ignitable, reactive or incompatible waste on site?	✓		
If yes, what are the approximate types and quantities and location of the waste. LIQUID PORTION OF MEK & ACETONE			
2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?	✓		
If no, please explain.			
3) In your opinion, are proper precautions taken so that these wastes do not:			
— generate extreme heat or pressure, fire or explosion, or violent reaction?	✓		
— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?	✓		
— damage the structural integrity of the device or facility containing the waste?	✓		
— threaten human health or the environment?	✓		

40 CFR 265 - Subpart C - Preparedness and Prevention

	YES	NO	N/A
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?	✓		
— a telephone or other device to summon emergency assistance from local authorities?	✓		
— portable fire equipment?	✓		
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	✓		
265.33 Is equipment tested and maintained?	✓		
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	✓		
265.35 Adequate aisle space?	✓		
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.	✓		

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?	✓		
1) Does the plan describe arrangements made with the local authorities?	✓		
2) Has the contingency plan been submitted to the local authorities?	✓		
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?			
4) Does the plan have a list of what emergency equipment is available?	✓		
5) Is there a provision for evacuating facility personnel?	✓		
6) Was there an emergency coordinator present or on call at the time of the inspection?	✓		

40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reporting

265.71 - Use of the Manifest

1) Has the facility received hazardous waste from an off-site source since November 19, 1980?	✓		
If no, skip to 265.73 - Operating Record			
2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?	✓		
If not, please explain.			

	YES	NO	N/A
3) How many post-November 19 manifests does the facility have? (Estimate if the number is large) ≈ 5			
4) Does each manifest have the following information? (circle missing information)			
— a manifest document number?	✓		
— the generators name, mailing address, telephone number and EPA I.D. #?	✓		
— the transporters name and EPA I.D. Number?	✓		
— the TSD name, address, telephone number & EPA I.D. Number?	✓		
— a description of the waste (DOT)?	✓		
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded: into or onto the transport vehicle?	✓		
— a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	✓		
(Obtain a copy of the incomplete manifests)			

265.72 - Manifest Discrepancies

	YES	NO	N/A
Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?		✓	
Describe unreconciled descrepancies.			

265.73 - Operating Record

	YES	NO	N/A
1) Does the facility keep an operating record?	✓		
2) Does the record contain the following information:			
a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?	✓		
b) The location and quantity of each hazardous waste at each location?	✓		
c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?	✓		
d) Summary reports and details of all incidents that require implementing the contingency plan.	✓		
e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?	✓		
f) Monitoring, testing or analytical data where required for: Groundwater, Land Treatment, Incinerators, and Thermal Treatment?	✓		

265.76 - Unmanifested Waste Report

	YES	NO	N/A
Has the facility accepted hazardous waste from off-site sources without a manifest?		✓	
If yes, has the facility submitted an unmanifested waste report?			

40 CFR 265 Subpart F - Groundwater Monitoring	YES	NO	N/A
(Applies only to surface impoundments, landfills and/or land treatment facilities.)			
Is a groundwater monitoring plan available at the facility?			✓
If yes, please fill out the appropriate Groundwater Monitoring Questionaire and attach to this report.			

40 CFR 265 Subpart G - Closure and Post-Closure

265.111 Closure Performance Standard			
Have any portions of the facility been closed since November 19, 1980?		✓	
If yes, please explain			

265.112 - Closure Plan			
Does the facility have a written closure plan? (Applies to all types of TSD facilities)	✓		
If yes, does the written plan include:			
1. A description of how and when the facility will be partially (if applicable) and ultimately closed?	✓		
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	✓		
3. A description of the steps necessary to decontaminate facility equipment during closure?	✓		
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?	✓		
5. Does the owner/operator have a written estimate of of the cost of closing the facility?	✓		
If yes, what is it? ($) 35,000			

265.118 - Post Closure Plan			
Does the facility have a written post-closure plan? (Applies only to disposal facilities)	✓		✓
If yes, Does the Plan:			
1. Identify the activities which will be carried on after closure and the frequency of these activities?	✓		
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?	✓		
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?	✓		
4. Include the name, address and phone number of a person or office to contact during post-closure?	✓		
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?	✓		
If yes, what is it? ($) 35,000			

Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

Storage	Treatment	Disposal
(Container - pg 6)	Tank - pg 7	Landfill - pg 11
Tank, above ground-pg 7	Surface Impoundment-pg 8	Land Treatment - pg 10
(Tank, below ground-pg 7)	Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundments-pg 8	Thermal Treatment- pg 12	Other ~~[illegible]~~ combustion in boilers for energy recovery
Waste Piles - pg 9	Land Treatment - pg 10	
Other_____	Chemical, Physical and Biological Treatment - pg 13	
	Other_____	

	YES	NO	N/A
40 CFR 265 - Subpart I - Containers			
1) - What type of containers are used for storage. Describe the size, type, quantity and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone) 55 gal drums			
2) - Is there a containment system for spills, leaks and precipitation? If yes, describe.	✓		
265.171 - Do the containers appear to be in good condition, not in danger of leaking? If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.	✓		
265.172 - Are hazardous waste stored in containers made of compatible materials? If not, please explain.	✓		
265.173(a) - Are all containers closed except those in use?	✓		
265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	✓		
265.174 - Is the storage area inspected at least weekly?	✓		
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	✓		
265.177 - Are incompatible wastes stored separate from each other? If no, explain	✓		

40 CFR 265 Subpart J - Tanks	YES	NO	N/A
265.190 1) What are the approximate number and size of tanks containing hazardous waste? (1) 200000 gal (1) 10,000 gal	—	—	—
2) Identify the waste treated/stored in each tank. fuel oil & waste solvents for combustion in boilers			
265.192 - General Operating Requirements			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	✓	—	—
If no, please explain.			
2) Are there leaking tanks?	—	✓	—
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	✓	—	—
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	—	—	✓
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank	—	—	✓
265.194 - Inspections			
1) Is the tank(s) inspected each operating day for a) discharge control equipment	✓	—	✓
b) monitoring equipment BURIED	✓	—	—
c) level of waste in tank use LEL meter to vapors	✓	—	—
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	✓	—	—
3) Are there underground tanks?	✓	—	—
If yes, how many and can they be entered for inspection? (2) no	~~✓~~	✓	—
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	✓	—	—
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?	✓	—	—

40 CFR 265 Subpart K - Surface Impoundments N/A

YES NO N/A

Describe the design and operating features of the surface impoundment to prevent ground water contaimination (e.g., Liner leachate collection system).

265.220 - Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of wastes stored and treated.

265.222 - Is there at least 2 feet of freeboard in the impoundment? ___ ___ ___

265.223 - Do all earthen dikes have a protective cover to preserve their structural integrity? ___ ___ ___

If yes, please specify the type of covering.

265.226 - 1) Is the free board level inspected daily? ___ ___ ___

2) Are the dikes surrounding the surface impoundment inspected for leaks, deterioration or failures inspected weekly? ___ ___ ___

265.229 - 1) Are any ignitable or reactive wastes placed in the impoundment? ___ ___ ___

2) If yes, is the waste treated immediately after placement in the impoundment to render the waste non-active and/or non-ignitable? ___ ___ ___

3) If no, to (2) explain.

265.230 - Are incompatible wastes placed in the impoundment? ___ ___ ___

If yes, explain.

40 CFR 265 Subpart L - Waste Piles N/A

	YES	NO	N/A
265.250 - How many waste piles are on-site and approximately how large are they? (Please indicate size and height and types of wastes in piles.)			
265.251 - Is the waste pile protected from wind erosion?	—	—	—
a) Does it appear to need such protection?	—	—	—
b) Explain what type of protection does exist.			
265.253 Containment.			
1) Is leachate run-off from the waste piles a hazardous waste? If no, skip down to 265.256.	—	—	—
2) Is the pile placed on an impermeable base?	—	—	—
3) Is run-on diverted away from the pile?	—	—	—
4) Is the leachate and run-off collected and treated?	—	—	—
If no to any of the above questions above then:			
5) Is the pile protected from precipitation and run-on?	—	—	—
6) Are wastes containing free liquids placed in the pile?	—	—	—
265.256 - 1) Are ignitable or reactive wastes placed on the pile? If no, skip to §265.257	—	—	—
2) Is the ignitable or reactive waste added to existing pile resulting in it no longer meeting the definition of ignitable and reactive? If no, explain.	—	—	—
3) Is the waste protected from any materials or condition that may cause it to ignite or react? If no, explain.	—	—	—
265.257 - Does it appear that a pile of incompatible wastes is being stored separate from other wastes or materials, or protected from them by means of a dike, berm, wall or other device? If no, explain.	—	—	—

40 CFR 265 Subpart M - Land Treatment N/A

265.270 - Identify the types of waste and the size of the land treatment area?

	YES	NO	N/A
265.272 - General Operating Requirements			
1) Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the soil?	—	—	—
Please explain how.			
2) Is run-on diverted from the active portions of the land treatment facility?	—	—	—
3) Is run-off from the active portions of the facility collected?	—	—	—
If yes, is the run-off a hazardous waste?	—	—	—
265.276 - Food Chain Crops			
1) Are food chain crops being grown on the facility property? If yes, can the facility operator document that arsenic lead and mercury:	—	—	—
- will not be transferred to the crop or ingested by food-chain animals or	—	—	—
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on the untreated soils.	—	—	—
2) Has notification of the growing of food chain crops been made to the Regional Administrator?	—	—	—
265.278 - Is there a written and implemented plan for unsaturated zone monitoring?	—	—	—
Make copy for office review.			
265.279 - Are there records of the application dates, application rates, quantities and location of each hazardous waste placed at the facility?	—	—	—
265.281 - Is ignitable or reactive waste immediately incorporated into the soil so that the resulting waste no longer meets that definition?	—	—	—
If not, please explain.			
265.282 - Are incompatible waste placed in separate land treatment areas?	—	—	—
If no, please explain.			

40 CFR 265 Subpart J - Landfills N/A

	YES	NO	N/A
265.300 - Identify the types of waste and size of the landfill.			
265.302 - General Operating Requirements			
1) Is run-on diverted away from the active portions of the landfill?	___	___	___
2) Is run-off from active portions of the landfill collected?	___	___	___
3) Is waste which is subject to wind dispersal controlled?	___	___	___
Please explain how.			
265.309 - Does the owner/operator maintain a map with:			
1) The exact location and dimensions of each cell?	___	___	___
2) The contents of each cell and approximate location of each hazardous waste type?	___	___	___
265.312 - Is ignitable or reactive waste treated so that it is not ignitable or reactive before being place in the landfill?	___	___	___
Explain how you know.			
265.313 - Are precautions taken to ensure that incompatible waste are not placed in the same landfill cell?	___	___	___
If no, please explain.			
265.314 Special Requirements for Liquid Waste			
1) Are bulk or non-containerized wastes containing free liquids placed in the landfill?	___	___	___
If yes,			
a) Does the landfill have a liner which is chemically and physically resistant to the added liquid? or	___	___	___
b) Is the waste treated and stabilized so that free liquids are no longer present?	___	___	___
2) Are containers holding liquid waste or waste containing free liquids placed in the landfill?	___	___	___
Please describe the types and contents of such containers placed in the landfill.			
265.315 - Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried ?	___	___	___
265.316 - Are small containers of hazardous waste in overpacked drums placed in the landfill?	___	___	___
If yes, please describe precautions taken to prevent the release of the waste.			

40 CFR 265 Subpart O & P - Incinerator and Thermal Treatment

	YES	NO	N/A
1) What type of incinerator or thermal treatment is at the site (e.g waterwall incinerator, boiler, fluidized bed, etc.) 2 - 150HP CYCLOTHERM BOILERS			
2) List the types and quantities of HW incinerated or thermally treated. SPENT SOLVENTS ≃ 9000 GALS IN ONE YEAR			
3) Is the residue from the incinerator thermal treatment unit a hazardous waste? NO RESIDUE		✓	
4) What types of air pollution control devices (if any) are installed in the incinerator/or thermal treatment unit? NONE			
5) Is energy recovered from the process? If yes, describe. HEAT	✓		
6) What is the destruction and removal efficiency for the organic hazardous waste constituents? 100%			
265.341 and 265.375 - Does the operating record include additional analysis to determine types of pollutants which might be emitted including:			
- heating value of the waste?	✓		
- halogen and sulfur content?	✓		
- concentrations of lead and mercury? LEAD ONLY ≃ 7ppm ≃ ASH	✓		
If no to any of the above questions is there justification and documentation?			
265.345 and 265.373 If operating, does it appear the incinerator/or thermal treatment unit is operating at steady state for conditions of operation, including temperature and air flow?	✓		
265.347 and 265.377 - Monitoring and Inspection 1) Are existing instruments relating to combustion and emission controls monitored every 15 minutes?	✓		
If no, explain			
2) Does the incinerator/thermal treatment have all the following instruments for measuring: wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle missing instruments)		✓	
If no, explain. CONTAINS STD BOILER INSTRUMENTATION			
3) Is the stack plume observed visually at least hourly for opacity and color?		✓	
4) Are there any signs of leaks, spill and fugitive emissions associated with the pumps, valves, conveyors, pipes etc? If yes, describe.	✓		
5) Are all emergency shutdown controls and system alarms checked to assure proper operation?	✓		
6) Is there any reason to believe the incinerator is being operated improperly? i.e., steady state conditions are not maintained. If yes, explain.		✓	
7) Is the incinerator/thermal treatment inspected daily?	✓		

	YES	NO	N/A
265.382 Is there open burning of hazardous waste?	—	✓	—
a) If yes, what is being burned? (Only burning or detonation of explosives is permitted)			
b) If open burning or detonation of explosives is taking place approximately what is the distance from the open burning or detonation to the property of others?			

40 CFR 265 Subpart Q - Chemical, Physical and Biological Treatment (other than in tanks, surface impoundments or land treatment facilities) N/A

1) Describe the treatment system at this facility and the the types of wastes treated.

265.401 - Does the treatment process system show any signs of ruptures, leaks or corrosion?	—	—	—
If yes, describe.			
265.401 - Is there a means to stop the inflow of continuously-fed hazardous wastes?	—	—	—
265.403 - Inspections			
1) Is the discharge control safety equipment (e.g. waste feed cut-off systems, by-pass systems, drainage systems and pressure relief systems) in good working order?	—	—	—
Are they inspected at least once each operation day?	—	—	—
2) Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?	—	—	—
Is data gathered at least once each operating day?	—	—	—
3) Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?	—	—	—
4) Are the discharge confinement structures, (e.g. dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g. wet spots or dead vegatation?	—	—	—
265.405 - Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or or conditions which may cause it to ignite or react?	—	—	—
If yes, explain how.			
265.406 - Are the incompatible wastes placed in the same treatment process?	—	—	—
If yes, please explain.			

GENERATOR INSPECTION CHECKLIST

	YES	NO	N/A
40 CFR 262 Subpart A-General			
262.11 - Hazardous waste determination			
1) Did the generator test its waste to determine whether it is hazardous?	✓		
Is the waste hazardous?	✓		
2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	✓		
40 CFR 262 Subpart B-The Manifest			
Has hazardous waste been shipped off-site since November 19, 1980?	✓		
If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain. 80 DRUMS EVERY 6 MOS			
262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.			
— a manifest document number?	✓		
— the generators name, mailing address, telephone number and EPA I.D. Number?	✓		
— the transporters name and EPA I.D. Number?			
— the name, address and EPA ID Number of the designated facility?	✓		
— a description of the wastes (DOT)?	✓		
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?	✓		
— a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	✓		
(obtain a copy of the incomplete manifests)			
40 CFR 262 - Subpart D - Recordkeeping and Reporting			
262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)	✓		
262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?	✓		
If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?			

	YES	NO	N/A
40 CFR 262 - Subpart C - Pretransportation Requirements			
262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:			
1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179)	✓		
2) Label each package according to DOT (i.e., 49 CFR 172)	✓		
3) Mark each package according to DOT (i.e., 49 CFR 172)	✓		
4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA," and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304)	✓		
262.34 Accumulation Time			
1) How is waste accumulated on-site?			
☒ Containers			
☒ Tanks			
☐ Surface impoundments (complete SWMF checklist)			
☐ Piles (complete SWMF checklist)			
2) Is waste accumulated for more than 90 days?	✓		
If yes, complete SWMF checklist			
3) Is each container clearly dated with each period of accumulation so as to be visible for inspection?	✓		
4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements?	✓		

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

262.34 - SHORT TERM ACCUMULATION STANDARDS

(For generators who accumulate waste in tanks or containers for 90 days or less)

40 CFR 265 - Subpart I Containers

	YES	NO	N/A
265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone).			
265.171 - Do the containers appear to be in good condition, not in danger of leaking?	___	___	___
If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
265.172 - Are hazardous waste stored in containers made of compatible materials?	___	___	___
If not, please explain.			
265.173(a) - Are all containers closed except those in use?	___	___	___
265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	___	___	___
265.174 - Is the storage area inspected at least weekly?	___	___	___
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	___	___	___
265.177 - Are incompatible wastes stored separate from each other?	___	___	___

		YES	NO	N/A
40 CFR 265 Subpart J - Tanks				
265.190	1) What are the approximate number and size of tanks containing hazardous waste?	___	___	___
	2) Identify the waste treated/stored in each tank.			
265.192 -	General Operating Requirements			
	1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	___	___	___
	If no, please explain.			
	2) Are there leaking tanks?	___	___	___
	3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	___	___	___
	4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	___	___	___
	5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank	___	___	___
265.194 -	Inspections			
	1) Is the tank(s) inspected each operating day for			
	a) discharge control equipment	___	___	___
	b) monitoring equipment	___	___	___
	c) level of waste in tank	___	___	___
	2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	___	___	___
	3) Are there underground tanks?	___	___	___
	If yes, how many and can they be entered for inspection?	___	___	___
265.198 -	Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	___	___	___
	If no, please explain.			
265.199 -	Does it appear that incompatible wastes are being stored separate from each other?	___	___	___

	YES	NO	N/A
265.16 - Personnel Training			
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?			
If yes, have facility personnel taken part in an annual review of training?			
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?			
—type and amount of training to be given to personnel in jobs related to hazardous waste management?			
—actual training or experience received by personnel?			
3) Are training records kept on all employees for at least 3 years?			

40 CFR 265 - Subpart C - Preparedness and Prevention

265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?			
— a telephone or other device to summon emergency assistance from local authorities?			
— portable fire equipment?			
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.			
265.33 Is equipment tested and maintained?			
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?			
265.35 Adequate aisle space?			
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.			

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?			
1) Does the plan describe arrangements made with the local authorities?			
2) Has the contingency plan been submitted to the local authorities?			
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?			
4) Does the plan have a list of what emergency equipment is available?			
5) Is there a provision for evacuating facility personnel?			
6) Was there an emergency coordinator present or on call at the time of the inspection?			

BORDEN INC
180 EAST BROAD STREET, COLUMBUS, OHIO 43215

THOMAS R. HEATON
ENVIRONMENTAL SPECIALIST
ENVIRONMENTAL AFFAIRS

April 14, 1982

Lynette
- Please revise the facility mailing address for each facility on the attached list.
Tm

U. S. Environmental Protection Agency
Office of Legal Counsel and Enforcement
Water and Solid Waste Division
Waterside Mall West Tower
401 M Street S.W.
Washington, D.C. 20460

Gentlemen:

Enclosed herewith is a list of the Borden Inc. facilities for which permit applications to treat, store, or dispose of hazardous waste were submitted to the USEPA Regional Offices November 18, 1980. Directing your attention to the "reverse" side of Form 1, General of these applications, Borden Chemical's owner/operator representative, Mr. Robert Gutheil, discharges the direct responsibility for environmental concerns to Borden's Director of Corporate Environmental Affairs.

Therefore, to avoid any potential for a correspondence from your agency to be misdirected, please send future correspondence which would normally go to the owner/operator representative to:

W. Bailey Barton - C105
Director, Environmental Affairs - C105
Borden Inc.
180 East Broad St. - C105
Columbus, Ohio 43215
- C107 C105 C109

Thank you for your cooperation in this matter.

Revised mailing address for the attached list of facilities

Sincerely,

Thomas R Heaton

Thomas R. Heaton

TRH/slw

Call Heaton
Should this new address be used for all facility correspondence

PERMIT APPLICATION FOR A FACILITY TO
TREAT, STORE OR DISPOSE OF
HAZARDOUS WASTES
PART A, FORMS 1 AND 3

SUBMISSIONS TO US EPA REGION II
November 18, 1980

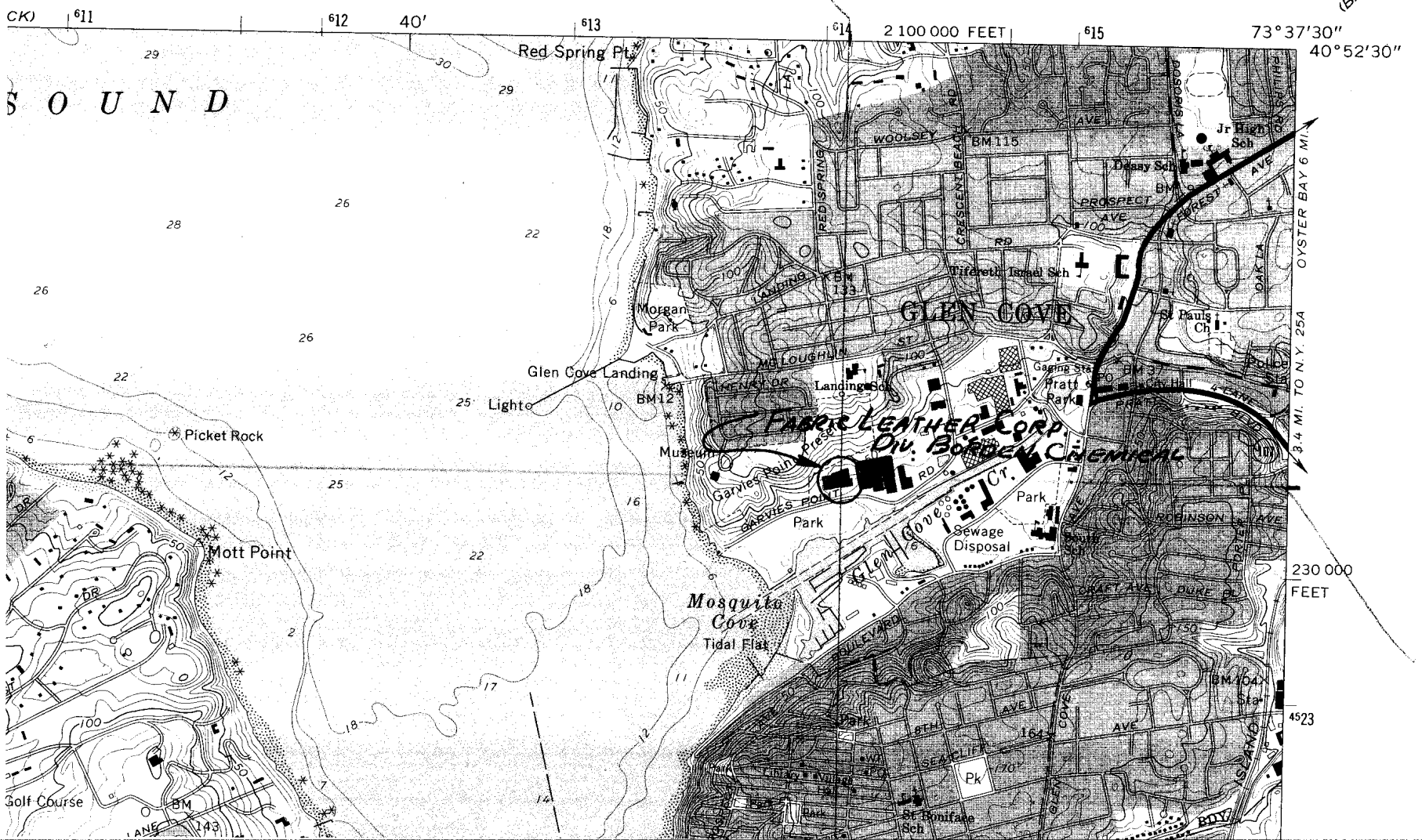
FACILITY	CITY	STATE
Borden Chemical, Adhesives & Chemicals Div.	Middlesex	NJ
Borden Chemical, Printing Ink Div.	Camden	NJ
Borden Chemical, Adhesives & Chemicals Div. NYD012497335	Brooklyn	NY
Borden Chemical, Printing Ink Div.	Fairlawn	NJ
Borden Chemical, Consumer Products Div.	Bainbridge	NY
Borden Chemical, Printing Ink Div. NYD 002234813	Depew	NY
Borden Chemical, Adhesives & Chemicals Div. NYD 370558?	Bainbridge	NY
Fabric Leather NYD000691865 NYD008918450	Glen Cove	NY
Borden Can Manufacturing	Lyons	NY
Industrias La Famosa NYD003926805 PRD000692640	Bayamon	PR

J# HW0045 9/29/82

W YORK
ANSPORTATION

SEA CLIFF QUADRANGLE
NEW YORK
7.5 MINUTE SERIES (TOPOGRAPHIC)

6265 I NE
(BAYVILLE)



RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: Fabric Leather Corp. EPA I.D. Number: NYDO 089184450

COMPANY ADDRESS: 40 Garvies Point Road
Glen Cove, New York

COMPANY CONTACT OR OFFICIAL: William Goodger

TITLE: Plant Engineer

OTHER ENVIRONMENTAL PERMITS HELD BY FACILITY:
- [ ] NPDES
- [x] AIR
- [ ] OTHER

INSPECTOR'S NAME: Jonathan Josephs

BRANCH/ORGANIZATION: Water Facilities Branch/EPA

DATE OF INSPECTION: 8/26/81

TIME OF DAY INSPECTION TOOK PLACE: 10 AM - 1 PM

(1) Is there reason to believe that the facility has hazardous waste on site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

- [x] Company admits that its waste is hazardous during the inspection.
- [x] Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- [x] The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- [ ] The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- [ ] The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- [ ] EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- [ ] Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?		X	

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each. Spent solvents (F003 & F005)
~50 drums
2 tanks (total capacity 30,000 gallons)

	YES	NO	DON'T KNOW
(2) Does the facility generate hazardous waste?	X		
(3) Does the facility transport hazardous waste?		X	
(4) Does the facility treat, store or dispose of hazardous waste?	X		

VISUAL OBSERVATIONS

	YES	NO	DON'T KNOW
(5) SITE SECURITY (§265.14)			
a. Is there a 24-hour surveillance system?	—	—	X
b. Is there a suitable barrier which completely surrounds the active portion of the facility?			X
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	—	—	X
(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27)	X ignitable only	—	—
a. If "YES", what are the approximate quantities?			
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste?	X	—	—
c. If "YES", explain — No smoking signs posted.			
d. In your opinion, are proper precautions taken so that these wastes do not:			
- generate extreme heat or pressure, fire or explosion, or violent reaction?	X	—	—
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	X	—	—
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	X	—	—
- damage the structural integrity of the device or facility containing the waste?	X	—	—
- threaten human health or the environment?	X	—	—

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility? — No

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32)

	YES	NO	DON'T KNOW
- an internal communications or alarm system?	X	___	___
- a telephone or other device to summon emergency assistance from local authorities?	X	___	___
- portable fire equipment?	X	___	___
- adequate aisle space?	X	___	___
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.	X	___	___

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

*(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? — Not applicable — ___ ___

If you have, please comment, as appropriate.

(9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain. — ___ ___ X

b. Do you believe that operation of this facility may affect groundwater quality? — ___ X ___

c. If "YES", explain.

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)? — X ___ ___

a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received? — X ___ ___

b. How many post-November 19 manifests does it have? (If the number is large, you may estimate) — approximately 5 shipments from Applied Environmental Services, Glenwood Landing

c. Does each manifest (or a representative sample) have the following information?

- a manifest document number — X ___ ___

---

* This requirement applies only after November 19, 1981.

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number	X		
- the name, and EPA identification number of each transporter	X		
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;	X		
- a DOT description of the wastes	X		
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	X		
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	X		
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.		X	

(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13) — The waste analysis procedure are not in the form of a written plan. — | | X |

a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one)
Waste characteristics vary X
All wastes are basically the same
Company treats all waste as hazardous
Don't Know
— Waste solvents burned are tested for BTU value, chlorine (only non-halogenated solvents are burned), Lead, Sulfur, ash, etc.

b. Does hazardous waste come to this facility from off-site sources? | X | | |

c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest? Waste analyses are received for off-site generated wastes | X | | |

(12) INSPECTIONS (§265.15)

a. Does the facility have a written inspection schedule? Yes. But not specific to only hazardous waste. | X | | |

b. Does the schedule identify the types of problems to be looked for and the frequency for inspections? | | X | |

c. Does the owner/operator record inspections in a log? | X | | |

d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain. — No hazardous waste problems noted | | | |

	YES	NO	DON'T KNOW
(13) PERSONNEL TRAINING (§265.16)			
a. Is there written documentation of the following:			
- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?	X		
- type and amount of training to be given to personnel in jobs related to hazardous waste management?		X	Training program for hazardous waste is not very specific.
- actual training or experience received by personnel?		X	
(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51)	X		
a. Does the plan describe arrangements made with local authorities?	X		
b. Has the contingency plan been submitted to local authorities?	X		
How do you know?	Shown copies of letters to police and fire departments.		
c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators?	X		
d. Does the plan have a list of what emergency equipment is available?	X		
e. Is there a provision for evacuating facility personnel?	X		
f. Was an Emergency Coordinator present or on call at the time of the inspection?	X		
(15) Does the owner/operator keep a written operating record with: (§265.73)			
- a description of wastes received with methods and dates of treatment, storage or disposal?	X		
- location and quantity of each waste?	X		
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility?	X		
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?	No incidents		
*(16) Does the facility have written closure and post-closure plans? (§265.110)	X		
a. Does the written closure plan include:			
- a description of how and when the facility will be partially (if applicable) and ultimately closed?	- some description of how, not when	X	

* Effective date for this requirement is May 19, 1981.

	YES	NO	DON'T KNOW
Closure plan developed by parent company (Borden, Inc.) needs to be made more specific to this facility.			
- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility? 35,000 gallons	X		
- a description of the steps necessary to decontaminate facility equipment during closure? triple rinse equpt.	X		
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?		X	
b. What is the anticipated date for final closure? None			
†c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities? Not applicable			
d. Does the written post-closure plan include:			
- a description of planned groundwater monitoring activities and their frequencies during post-closure? Not applicable			
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?			
- the name, address and phone number of a person or office to contact during post-closure?			
*(17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it? Verbal estimate $50,000		X	
*(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144) Not applicable			
*(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (§265.90) Not applicable			
a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste mangement area?			
b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area?			

† This section applies only to disposal facilities.

* Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT	DISPOSAL
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
(Container p. 7)	Incineration pp. 12-13	Surface Impoundment p. 8
Tank, above ground p. 8	Thermal Treatment pp. 12-13	
(Tank, below ground p. 8)	Land Treatment pp. 9-10	Other _____
Other _____	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	
	Other _____	

CONTAINERS (§265.170)

	YES	NO	DON'T KNOW
1. Are there any leaking containers? If "YES", explain.		X	
2. Are there any containers which appear in danger of leaking? If "YES", explain.		X	
3. Do wastes appear compatible with container materials?	X		
4. Are all containers closed except those in use?	X		
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?		X	
6. How often does the plant representative claim to inspect container storage areas?	A. daily		
7. Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES", explain.		X	
8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?			X
9. What is the approximate number and size of containers with hazardous wastes?	~50 drums 55 gallons each Stored indoors on concrete floor		

TANKS (§265.190)	YES	NO	DON'T KNOW
1. Are there any leaking tanks? If "YES", explain.	—	—	X
Tanks are underground, but can be entered for inspection.			
2. Are there any tanks which appear in danger of leaking. If "YES", explain.	—	X	—
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.	—	X	—
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	Tanks are covered.		
	—	—	—
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?	Not continuously filled. Level of tank measured before each filling.		
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.	—	X	—
7. How often does the plant manager claim to inspect ~~containers~~ tank storage areas?	daily. Tank level reading is logged each day.		
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain.	X	—	—
9. What is the approximate number and size of tanks containing hazardous wastes?	Two tanks. 30,000 gal. capacity, total.		

SURFACE IMPOUNDMENTS (§265.220)			
	— Not applicable		
1. Is there at least 2 feet of freeboard in the impoundment?	—	—	—
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.	—	—	—
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.	—	—	—

Additional — Facility has an incinerator which was intended to burn exhaust fumes from product equipment (e.g. solvent fumes). This incinerator has not been used because the facility has been able to meet its present air emission standards without it. Some exhaust fumes go through an electrostatic precipitator which collects plasticizer droplets. The plasticizer which is collected in the precipitator is also burned in the boiler. It is not a hazardous waste according to Mr. Goodger.

Jonathan Josephs
8/27/81

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: October 31, 2013 - 5:13 PM

Version 5.0

User Selection Criteria

Location:	New York, all activities	**Activity Location:**	None Chosen
Handler ID:	NYD008918450	**Group of IDs:**	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 10/31/2013		
Location County Code:	None Chosen	**Evaluation Type:**	
Location City:		**Focus Area:**	
Location Zip Code:		**Violation Type:**	
State District:	None Chosen	**Display Code Descrip.:**	Yes
Sort Order:	Region, State, Handler Name	**Display Universes:**	Yes

Results

Data meeting the criteria you selected follows.

Total Pages:5 Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name:	cme_foia.rdf
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed:	June 2006
Last Updated:	May 2012
Contact:	rcrainfo.help@epa.gov
Tables Used:	cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries:	none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: October 31, 2013 - 5:13 PM

FABRIC LEATHER CORP

County Name / Code: NASSAU / NY059

NYD008918450

REGION 02

Location: 40 GARVIES POINT RD; GLEN COVE, NY 11542-2821

Mailing: 40 GARVIES POINT RD; GLEN COVE, NY 11542

Activity Location: NY | State District: NYSDEC R1 | Accessibility: | Non-Notifier: | Extract Flag: Y | Active Site: N

Generator: N | Transporter: N | Operating TSDF: ------ | IC In Place: N | EI Indicator (HE / GW): N / N

Short-Term Gen: N | Transfer Facility: N | Offsite Receiver: N | HSM: N | Subpart K: ----

Full Enforcement: ------ | Converter: ------ | State Unaddressed SNC: N | EPA Unaddressed SNC: N

CA Wrkld: N | State TSDF: ------- | State Addressed SNC: N | EPA Addressed SNC: N

Active State Gen: N | State SNC w/Comp Sched: N | EPA SNC w/Comp Sched: N

Violation: Activity Location: NY | Type: 262.A | Determined Date: 09/16/1988 | Determined by Agency: State | Responsible Agency: State

Scheduled Compliance Date: 12/27/1988 | Actual Compliance Date: 01/26/1989 | RTC Qualifier: OBSERVED | Sequence Number: 4

CEI Evaluation 09/16/1988 | Activity Location: NY | By: State | Identifier: 006 | Person: NYDEC | Branch: | Found Violation: YES

Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

Enforcement: Activity Location: NY | Type: 120 | Action Date: 10/28/1988 | Identifier: 004

Docket: | Agency: State | Responsible Person: NYDEC | Branch:

CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

Violation: Activity Location: NY | Type: 262.A | Determined Date: 02/14/1986 | Determined by Agency: State | Responsible Agency: State

Scheduled Compliance Date: 04/10/1986 | Actual Compliance Date: 04/22/1986 | RTC Qualifier: OBSERVED | Sequence Number: 3

CEI Evaluation 02/14/1986 | Activity Location: NY | By: State | Identifier: 005 | Person: NYDEC | Branch: | Found Violation: YES

Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

Enforcement: Activity Location: NY | Type: 120 | Action Date: 03/10/1986 | Identifier: 003

Docket: | Agency: State | Responsible Person: NYDEC | Branch:

CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

Violation: Activity Location: NY | Type: 262.A | Determined Date: 03/26/1985 | Determined by Agency: State | Responsible Agency: State

Scheduled Compliance Date: 07/11/1985 | Actual Compliance Date: 11/19/1985 | RTC Qualifier: OBSERVED | Sequence Number: 2

CEI Evaluation 03/26/1985 | Activity Location: NY | By: State | Identifier: 003 | Person: NYDEC | Branch: | Found Violation: YES

Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

Enforcement: Activity Location: NY | Type: 120 | Action Date: 06/11/1985 | Identifier: 002

Docket: | Agency: State | Responsible Person: NYDEC | Branch:

CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

Violation: Activity Location: NY | Type: 262.A | Determined Date: 07/24/1984 | Determined by Agency: State | Responsible Agency: State

Scheduled Compliance Date: 12/08/1984 | Actual Compliance Date: 01/16/1985 | RTC Qualifier: OBSERVED | Sequence Number: 1

CEI Evaluation 07/24/1984 | Activity Location: NY | By: State | Identifier: 001 | Person: | Branch: | Found Violation: YES

Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

* Note: Penalty amount may not reflect all violations cited.

FABRIC LEATHER CORP, NYD008918450, GLEN COVE, NY, continued -

Enforcement: Activity Location: NY Type: 120 Action Date: 11/08/1984 Identifier: 001
Docket: Agency: State Responsible Person: NYDEC Branch:
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Evaluations With No Violations:

CEI Evaluation 10/08/2008	Activity Location: NY	By: State	Identifier: 001	Person: NYKMY	Branch: R1	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 10/08/2008		Focus Area:
NRR Evaluation 04/15/1985	Activity Location: NY	By: State	Identifier: 004	Person:	Branch:	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation 01/07/1985	Activity Location: NY	By: State	Identifier: 002	Person:	Branch:	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

Total Number of Handlers: 1
Total Number of Activity Locations: 1

*** End of Report ***

* Note: Penalty amount may not reflect all violations cited.

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: October 31, 2013 - 5:13 PM

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):

Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:

Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
NRR	NON-FINANCIAL RECORD REVIEW

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

* Note: Penalty amount may not reflect all violations cited.